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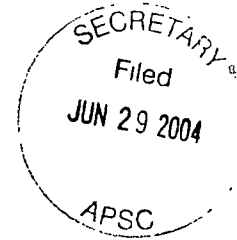
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June 29, 2004

BY HAND DELIVERY

Mr. Walter Thomas
Secretary
Alabama Public Service Commission
RSA Union Building
8th Floor
100 N. Union Street
Montgomery, Alabama 36104



Re: Joint Petition for Arbitration of NewSouth Communications Corp., KMC Telecom V, Inc., KMC Telecom III LLC, and Xspedius Communications, LLC on Behalf of its Operating Subsidiaries, Xspedius Management Co. Switched Services, LLC, Xspedius Management Co. of Birmingham, LLC, Xspedius Management Co. of Mobile, LLC and Xspedius Management Co. of Montgomery, LLC, of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as Amended; Docket No. 29242

Dear Mr. Thomas:

Enclosed for filing are the original and ten copies of the Joint Petitioners' Responses to BellSouth Telecommunications, Inc.'s First Set of Requests for Production in the above-referenced matter. Also enclosed is one copy of the attachments to same, to be filed under seal and which are also being provided to BellSouth's counsel and to the arbitrators pursuant to the confidentiality agreement.

Very truly yours,

Robin G. Laurie

RGL:dpe
Enclosures

cc: Terry L. Butts, Esquire
Mr. Larry Smith
Mr. Rolland Casey
Mr. Francis B. Semmes, Esq.

**BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION**

In the Matter of)	
)	
Joint Petition for Arbitration of)	
)	
NewSouth Communications Corp.,)	Docket No. 29242
KMC Telecom V, Inc., KMC Telecom III LLC, and)	
Xspedius Communications, LLC on Behalf of its)	
Operating Subsidiaries Xspedius Management Co.)	
Switched Services, LLC, Xspedius Management Co.)	
Of Birmingham, LLC, Xspedius Management Co.)	
Of Mobile, LLC, and Xspedius Management Co.)	
Of Montgomery, LLC)	
)	
Of an Interconnection Agreement with)	
BellSouth Telecommunications, Inc.)	
Pursuant to Section 252(b) of the)	
Communications Act of 1934, as Amended)	
)	

**JOINT PETITIONERS' RESPONSES TO
BELLSOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF REQUESTS FOR PRODUCTION**

NewSouth Communications Corp. ("NewSouth"), KMC Telecom V, Inc. and KMC Telecom III, LLC (collectively "KMC"), and Xspedius Communications, LLC ("Xspedius"), (collectively the "Joint Petitioners), by and through their attorneys, hereby submit their substantive responses to the First Set of Requests for Production propounded by BellSouth Telecommunications, Inc. ("BellSouth").

GENERAL OBJECTIONS

1. Joint Petitioners object to each and every Request to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege.
2. Joint Petitioners object to each and every Request to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

3. Joint Petitioners object to each and every Request to the extent that it is vague, overly broad, or contains undefined terms susceptible to multiple meanings.
4. Joint Petitioners object to each and every Request to the extent that it seeks production of information that is a matter of public record, for example, documents that have been filed with a government agency.
5. Joint Petitioners object to each and every Request to the extent that it seeks production of information that is in the possession, custody, or control of BellSouth.
6. Joint Petitioners object to each and every Request to the extent that it seeks production of information that is not in the possession, custody, or control of the Joint Petitioners.
7. Joint Petitioners object to each and every Request on the ground that they seek information for an indeterminate period of time and is thus overly broad and unduly burdensome. Joint Petitioners will provide non-privileged information that is responsive to the issue to which the Request responds.
8. Joint Petitioners object to each and every Request to the extent that it imposes a burden of discovery not required in the Rules of Civil Procedure.
9. Joint Petitioners object to each and every Request to the extent that it is unduly burdensome, expensive, or oppressive to respond as presently written, particularly where an Request seeks information regarding “all” instances or examples.
10. Joint Petitioners’ subsequent responses to BellSouth’s Interrogatories shall not be deemed an admission as to the relevance or materiality of any of the information sought therein. As discovery is ongoing in this matter, Joint Petitioners reserve the right to supplement and update these responses.

1. Please produce all documents that support, refer, relate, or pertain to your statement on Page 15 of the Testimony that "BellSouth's proposed language is designed to provide it with the opportunity to, in effect, hold newly adopted rate amendments hostage, and allow BellSouth to delay the implementation of an approved rate to the extent that the Commission's decision is unfavorable to it."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. Joint Petitioners note that in this request BellSouth references testimony not found on the page number cited by the request and, therefore, Joint Petitioners object to the extent that the item is confusing and imprecise. On the basis of these objections, Joint Petitioners will not produce any documents.

2. Please produce all documents that support, refer, relate, or pertain to your statement on Page 17 of the Testimony that "[o]bviously, this is a restrictive definition designed to serve some undefined and hereto fore undisclosed BellSouth motive."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

3. Please produce all documents that support, refer, relate, or pertain to your statement on Page 17 of the Testimony that “[f]or example, under BellSouth’s proposed definition of ‘End User,’ it is arguable that certain types of CLEC customers, such as Internet Service Providers (“ISPs”), might not be considered to be ‘End Users.’”

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

4. Please produce all documents that support, refer, relate, or pertain to your statement on Page 20 of the Testimony that "[c]ertain traffic passed to NewSouth by BellSouth over our Supergroups with a '0 CIC' would likely result in unbillable and uncollectible revenues."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see attached documents. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

This Request references testimony that was not sponsored by KMC; therefore, KMC is incapable of producing responsive documents.

Xspedius Response:

This Request references testimony that was not sponsored by Xspedius; therefore, Xspedius is incapable of producing responsive documents.

5. Regarding Issue No. G-4, please produce all telecommunications interconnection agreements that contain a provision that is identical or similar to the provision you are requesting the Commission adopt in this proceeding.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving these objections, Joint Petitioners state that they will produce interconnection agreements to which they are a party, if any, responsive to the specific Requests herein to the extent required by applicable law.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

6. Regarding Issue No. G-4, please produce all contracts or tariffs that you have with your customers, end users, vendors, or other third-parties that contain a provision that is identical or similar to the provision you are requesting the Commission adopt in this proceeding.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to this item on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The terms and conditions of Joint Petitioners' service contracts are not relevant to issue G-4. On the basis of these objections, Joint Petitioners will not produce any documents.

7. Please produce all documents that support, refer, relate, or pertain to your statement on Pages 23-24 of the Testimony that "the standard liability-cap formulations – starting from a minimum (in some of the more conservative contexts such as government procurements, construction and similar matters) of 15% to 30% of the total revenues actually collected or otherwise provided for over the entire term of the relevant contract – more universally appearing in commercial contracts."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

8. Please produce all documents that support, refer, relate, or pertain to your statement on Page 24 of the Testimony that "[t]he Petitioners' proposed risk-vs.-revenue trade off has long been a staple of commercial transactions across all business sectors, including regulated industries such as electric power, natural resources and public procurements and is reasonable in telecommunications service contracts as well."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

9. Please produce all documents that support, refer, relate, or pertain to your statement on Page 24 of the Testimony that "[i]n my experience, it is a common-sense and universally-acknowledged principle of contract law that a party is not required to pay for non-performance or improper performance by the other party."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

10. Please produce all documents that support, refer, relate, or pertain to your statement on Page 25 of the Testimony that "a breach in the performance of services results in losses that are greater than their wholesale costs"

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

11. Please produce all documents that support, refer, relate, or pertain to your statement on Page 25 of the Testimony that "these losses will ordinarily cost a carrier far more in terms of direct liabilities vis-à-vis those of their customers who are relying on properly-performed services under this Agreement, not to mention the broader economic losses to these carriers' customer relationships as a likely consequence of any such breach."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see response to Request for Production No. 14. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

12. Please produce all documents that support, refer, relate, or pertain to your statements on Page 25 of the Testimony that the "breach in the performance of services results in losses that are greater than their wholesale costs."

OBJECTION: Joint Petitioners object to the extent that this item is duplicative of Request No. 10 and, thus, unnecessarily repetitive. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving these objections, Joint Petitioners state that they will produce documents, if any, responsive to the specific Requests herein to the extent required by applicable law.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

13. Please produce all documents that support, refer, relate, or pertain to your statements on Page 25 of the Testimony that "losses will ordinarily cost a carrier far more in terms of direct liabilities vis-à-vis those of their customers who are relying on properly-performed services under this Agreement, not to mention the broader economic losses to these carriers' customer relationships as a likely consequence of any such breach."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and too burdensome to respond. Additionally, Joint Petitioners object to this request in that it is duplicative of Request No. 11 and, thus, unnecessarily repetitive. The testimony to which this item refers expresses the opinion of policy witnesses. Joint Petitioners also note that in this request BellSouth references testimony not found on the page number cited by the request and, therefore, Joint Petitioners object. On the basis of these objections, Joint Petitioners will not produce any documents.

14. Please produce all documents that support, refer, relate, or pertain to the loss of any end user or customer as a result of any alleged breach of performance by BellSouth.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see attached documents. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

15. Regarding Issue No. G-5, please produce all of your tariffs and/or end user contracts that do not contain any limitation of liability language.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to this Request on the ground that Joint Petitioners' tariffs are a matter of public record that is easily accessible by BellSouth. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

16. Please produce all documents that support, refer, relate, or pertain to the inclusion of limitation of liability language in your tariffs and/or end user contracts.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

NewSouth Response:

Please see documents attached pursuant to Request No. 17. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

Please see documents attached pursuant to Request No. 17. Given the ongoing nature of the discovery process, KMC reserves the right to amend or supplement this response should the circumstances warrant such action.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

17. Please produce your tariffs and/or end user contracts that include limitation of liability language.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and thus unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further note that their tariffs are publicly available documents to which BellSouth has ready access. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see attached documents. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

Please see attached documents. Given the ongoing nature of the discovery process, KMC reserves the right to amend or supplement this response should the circumstances warrant such action.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

18. Please produce all documents that support, refer, relate, or pertain to any instance where a customer or end user rejected your request that he/she/it agree to liability provisions that are similar to BellSouth's liability provisions, as stated on Page 28 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and thus unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to this item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

19. Regarding your statements on Page 28 of the Testimony, please produce all documents that support, refer, relate, or pertain to any instance where you have "conceded" limitation of liability language to "attract customers in markets dominated by incumbent providers."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to the item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

20. Please produce all documents that support, refer, relate, or pertain to statement on Page 34 of the Testimony that “[a]s is more universally the case in virtually all other commercial-services contexts, the service provider, not the receiving party, bears the more extensive burden on indemnities given the relative disparity among the risk levels posed by the performance of each.”

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

21. Please produce all of your tariffs and/or end user contracts that contain indemnification language.

OBJECTION: Joint Petitioners object to this Request on the ground that it is duplicative of previous items in this set of discovery. Joint Petitioners also object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object on the ground that all tariffs are publicly available and readily accessible by BellSouth. Joint Petitioners also object that the indemnification terms contained in their service contracts with customers are irrelevant to this proceeding. On the basis of these objections, Joint Petitioners will not produce any documents.

22. Please produce all documents that support, refer, relate, or pertain to your statement on Page 39 of the Testimony that "BellSouth often is able to force carriers into heavily discounted, non-litigated settlements."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

23. Please produce all documents that support, refer, relate, or pertain to any instance where BellSouth included a rate in the rate sheet of an interconnection agreement that is not the rate approved by the Commission, as set forth on Page 43 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also note that in this request BellSouth references testimony not found on the page number cited by the request and, therefore, Joint Petitioners object to the extent that the item is confusing and imprecise. Finally, Joint Petitioners object on the ground that BellSouth mischaracterizes the initial testimony, such that no response is warranted. On the basis of these objections, Joint Petitioners will not produce any documents.

24. Please produce all documents that support, refer, relate, or pertain to your statement on Page 47 of the Testimony that “[n]early all of the CLECs involved in this arbitration have had one bad experience or another with BellSouth using one of its Guides as controlling authority for an issue between the Parties instead of the Agreement.”

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

In response to this Request, NewSouth identifies those documents already in the possession of BellSouth and maintained and accessible at the following websites:

<http://www.interconnection.bellsouth.com/guides/index.html>

<http://interconnection.bellsouth.com/guides/index.html>

KMC Response:

See NewSouth Response.

Xspedius Response:

See NewSouth Response.

25. Please produce all documents that support, refer, relate, or pertain to your statement on Page 50 of the Testimony that BellSouth's tariff changes are "inconsistent with the Agreement, or are unreasonable or discriminatory."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The testimony to which this item refers expresses the opinion of policy witnesses. Joint Petitioners further object to this item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

26. Please produce all documents that support, refer, relate, or pertain to your statement on Page 60 of the Testimony that retermination of circuits is "likely to be nothing more than a cross-connect."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

27. Please produce all documents that support, refer, relate, or pertain to your statement on Page 60 of the Testimony that "[t]he CLECs are not disconnecting a service but rather are rearranging a service that cannot be maintained as currently offered under the Agreement."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

28. Please produce all documents that support, refer, relate, or pertain to your statement on Page 69 of the Testimony that "[a] minimum billing period of 30 days, 2 months, etc. . . would carry with it exclusive use right thereby inhibiting a customer's ability to switch carriers as he or she wishes."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

29. Please produce all documents that support, refer, relate, or pertain to your statement on Page 77 of the Testimony that "dispatch charges significantly undercut Petitioners' ability to compete effectively."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

30. Please produce all documents that support, refer, relate, or pertain to the loss of or failure to acquire any end user or customer because of dispatch charges.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and thus unduly burdensome. Joint Petitioners further object to the extent that this item is additive, duplicative, and thus intended to harass or vex. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to this item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

31. Please produce all documents that support, refer, relate, or pertain to the dispatch charges that you charge your end users or customers.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and thus unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The amounts that Joint Petitioners charge their customers is not the subject of any issue in this arbitration. On the basis of these objections, Joint Petitioners will not produce any documents.

32. Please produce all documents that support, refer, relate, or pertain to your plans to deploy or use "Etherloop" or "G.HDSL Long" technologies, as described on Page 84 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

33. Regarding Issue 2-23(D), please produce all documents that support, refer, relate, or pertain to the steps, measures, protections, procedures or other processes that you would use to access an "available pair."

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 2-23(D) has been resolved.

34. Regarding Issue 2-24, please produce all documents that support, refer, relate, or pertain to any instance where you have determined that testing of the loop at a place other than the distribution frame and at the end user's premises was required to "detect and pinpoint a problem," as set forth on Page 97 of the Testimony.

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 2-24 has been resolved.

35. Please produce all documents that support, refer, relate, or pertain to your statement on Page 108 of the Testimony that "BellSouth's conversions of special access to EELs have resulted in damages of approximately \$1.6 million."

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 2-31 has been resolved.

36. Please produce all telecommunications interconnection agreements that have identical or similar language for EELs audits that you are proposing in this proceeding.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

37. Please produce all documents that support, refer, relate, or pertain your statements on Page 114 of the Testimony that “[g]iven the history of controversy that has surrounded BellSouth’s EEL audits, the Petitioners understandably have genuine concerns about the legitimacy of BellSouth’s EEL audits.”

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. In addition, the testimony describes processes in which BellSouth was a party, and thus has equal or better access to responsive documents. On the basis of these objections, Joint Petitioners will not produce any documents.

38. Please produce all documents that support, refer, relate, or pertain to any instance where you lost or were unable to acquire an end user or customer because "caller ID does not appear," as set forth on Page 120 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to this item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

39. Please produce all documents that support, refer, relate, or pertain to any instance where you have been "mischarged for a Local Channel when an intra-office cabling scheme is used to connect their point-of-presence to the BellSouth switch," as set forth on Page 124 of the Testimony.

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 3-1 has been resolved.

40. Please produce all documents that support, refer, relate, or pertain to all instances in which BellSouth provided a root cause analysis to you.

OBJECTION: Joint Petitioners object to this Request to the extent that it is vague, overly broad, and unduly burdensome. In addition, Joint Petitioners object to this Request to the extent that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object on the ground that all responsive information is in BellSouth's possession. On the basis of these objections, Joint Petitioners will not produce any documents.

41. Please produce all documents that support, refer, relate, or pertain to your Testimony on Page 128 that you have experienced a global outage involving an entire trunk group.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see documents attached pursuant to Request No. 42. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

42. Please produce all documents that support, refer, relate, or pertain to your use of a root cause analysis to respond to customer inquiries regarding service outages or otherwise.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see attached documents. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

Please see attached documents. Given the ongoing nature of the discovery process, KMC reserves the right to amend or supplement this response should the circumstances warrant such action.

Xspedius Response:

Xspedius' search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

43. Please produce all documents that support, refer, relate, or pertain to any policies you have regarding advising customers as to service problems, "the steps taken to repair and avoid their recurrence in the future," as set forth on Page 129 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

44. Regarding Issue 3-3, please produce all documents, including but not limited to contracts, tariffs, policies, statements, and training manuals, that address, relate, pertain, or refer to the backbilling of customers.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to this item on the ground that Joint Petitioners' tariffs are a matter of public record and are easily accessible by BellSouth. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

45. Please produce all documents that support, refer, relate, or pertain to any instance where you were unable to bill a customer or end user after 90 days.

OBJECTION: Joint Petitioners object to this Request to the extent that it is vague, overly broad, and unduly burdensome. In addition, Joint Petitioners object to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object to the item on the grounds that it mischaracterizes the initial testimony in this case, and as such does not warrant a response. On the basis of these objections, Joint Petitioners will not produce any documents.

46. Please produce all documents that support, refer, relate, or pertain to your statement on Page 133 of the Testimony that "there is a potential that BellSouth will pay third parties without carefully scrutinizing their bills and the legal bases therefore, and expect reimbursement from CLECs, for unjust termination charges."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

47. Please produce all documents that support, refer, relate, or pertain to any instance where BellSouth paid third parties without carefully scrutinizing its bills and then attempted to charge CLECs for these "unjustified termination charges," as set forth on Page 133 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object to this Request on the ground that it mischaracterizes the relevant testimony such that no response is warranted. On the basis of these objections, Joint Petitioners will not produce any documents.

48. Please produce all documents that support, refer, relate, or pertain to any instance where BellSouth paid "third parties even when it has no contractual or other legal obligation to do so," as set forth on Page 134 of the Testimony.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object to this Request on the ground that it mischaracterizes the relevant testimony such that no response is warranted. On the basis of these objections, Joint Petitioners will not produce any documents.

49. Please produce all documents that support, refer, relate, or pertain to your statement on Page 136 of the Testimony that "[b]ecause factors reporting involves temporal measurements, it is more than likely that replacement factors created by BellSouth will not lend themselves to an apples-to-apples comparison."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

50. Please produce all documents that support, refer, relate, or pertain to your statement on Page 136 of the Testimony that "BellSouth has developed the TIC predominantly to exploit its monopoly legacy and overwhelming market power."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object that this item seeks discovery of information protected by the attorney-client privilege, work product doctrine, or other applicable privilege. The testimony to which this item refers expresses the opinion of policy witnesses. On the basis of these objections, Joint Petitioners will not produce any documents.

51. Please produce all documents that support, refer, relate, or pertain to your statement on Page 151 of the Testimony that “[t]o the extent the Parties are carrying non-transit and non-interLATA Switched Access Traffic, the parties should proportionally split the recurring charges for trunks and associated facilities.”

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 3-13 has been resolved.

52. Please produce all documents that support, refer, relate, or pertain to the percentage of your traffic that consists of "non-transit and non-interLATA Switched Access Traffic."

NewSouth, KMC and Xspedius Response:

Joint Petitioners note that Issue 3-13 has been resolved.

53. Regarding your Testimony on Page 154, please produce all documents that support, refer, relate, or pertain to any instance where, after collocating in a BellSouth premise, you have been unable to "gain access to loops, transport, multiplexers, switch ports, optical terminations and the like."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object to this Request on the ground that it mischaracterizes the relevant testimony such that no response is warranted. Joint Petitioners further object on the ground that responsive documents are in BellSouth's possession. On the basis of these objections, Joint Petitioners will not produce any documents.

54. Regarding Issue 6-2, please produce for the last 12 months all documents that support, refer, relate, or pertain to the number of CSRs you provided to BellSouth and the number of business days that elapsed between the date of receipt of a request for a CSR and the date you provided the CSR to BellSouth.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The interval in which BellSouth has processed CSR requests has no relevance to the matter being arbitrated in Issue 6-2. On the basis of these objections, Joint Petitioners will not produce any documents.

55. Regarding Issue 6-4, please produce all documents that support, refer, relate, or pertain to any products and/or services that you have actually ordered or wish to order from BellSouth that you contend cannot be ordered electronically.

OBJECTION: Joint Petitioners object to this Interrogatory to the extent that it is vague, overly broad, and unduly burdensome. In addition, Joint Petitioners object to this Interrogatory to the extent that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object on the ground that this question mischaracterizes the written testimony such that no response is required. On the basis of these objections, Joint Petitioners will not produce any documents.

56. For each such product or service identified in Request for Production No. 57, please produce all Local Service Requests ("LSRs") that you submitted to BellSouth for the last 12 months.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object on the ground that this item is unintelligible, as it requests LSRs "identified in Request for Production No. 57," an item which does not seek identification of LSRs. Joint Petitioners further object given that all information regarding CLP requests for LSRs is in BellSouth's possession. On the basis of these objections, Joint Petitioners will not produce any documents.

57. Please produce all documents that support, refer, relate, or pertain to your statement on Page 187 of the Testimony that "NewSouth's experience has been that a significant amount (we currently estimate 25%) of NewSouth's facility orders have to be submitted manually because of address validation errors" and that "NewSouth has found BellSouth to be delinquent in updated address records."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see attached documents. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

The testimony referenced within this Request addresses solely the testimony of NewSouth; therefore, KMC does not have and will not be capable of producing responsive documents.

Xspedius Response:

The testimony referenced within this Request addresses solely the testimony of NewSouth; therefore, Xspedius does not have and will not be capable of producing responsive documents.

58. Regarding your Testimony on Page 187, please produce all LSRs that NewSouth had to submit manually because of address validation errors.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

Please see documents attached pursuant to Request No. 57. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

The testimony referenced within this Request addresses solely the testimony of NewSouth; therefore, KMC does not have and will not be capable of producing responsive documents.

Xspedius Response:

The testimony referenced within this Request addresses solely the testimony of NewSouth; therefore, Xspedius does not have and will not be capable of producing responsive documents.

59. Regarding Issue 6-6, please produce for the last 12 months all documents that support, refer, relate, or pertain to the number of CSRs you provided to BellSouth and the number of business days that elapsed between the date of receipt of a request for a CSR and the date you provided the CSR to BellSouth.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The interval in which BellSouth has provided FOCs to Joint Petitioners bears no relevance to the matter being arbitrated in Issue 6-6. On the basis of these objections, Joint Petitioners will not produce any documents.

60. Regarding Issue 6-7, please produce for the last 12 months all documents that support, refer, relate, or pertain to the number of CSRs you provided to BellSouth and the number of business days that elapsed between the date of receipt of a request for a CSR and the date you provided the CSR to BellSouth.

OBJECTION: Joint Petitioners object to this Request on the ground that it is unintelligible, as Issue 6-7 does not regard the interval in which any party provides a CSR. Joint Petitioners also object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners further object to the extent that this item is additive, duplicative, and thus intended to harass or vex. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The interval in which BellSouth has provided order-related to Joint Petitioners bears no relevance to the matter being arbitrated in Issue 6-7. On the basis of these objections, Joint Petitioners will not produce any documents.

61. Regarding your statements on Page 197 of your Testimony, please produce all documents that support, refer, relate, or pertain to any efforts you have undertaken to develop your own OSS.

OBJECTION: Joint Petitioners object to this Request on the ground that it is vague, overly broad, and unduly burdensome. In addition, Joint Petitioners object to this Request on the ground that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Petitioners' OSS development and present status are not relevant to the issue discussed at the referenced pages of testimony. Based on these objections, the Joint Petitioners will not produce any documents.

62. Please produce all documents that support, refer, relate, or pertain to any instance where you lost or were unable to acquire an end user or customer as a result of a requirement that the porting of the end user or customer to the CLEC is contingent on either the CLEC having an operating, billing and/or collection arrangement with any third party carrier, including BellSouth Long Distance or the customer or End User changing its PIC.

OBJECTION: Joint Petitioners object to this Interrogatory to the extent that it is vague, overly broad, and unduly burdensome. In addition, Joint Petitioners object to this Interrogatory to the extent that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object on the ground that this question mischaracterizes the written testimony such that no response is required. On the basis of these objections, Joint Petitioners will not produce any documents.

63. Please produce all documents that support, refer, relate, or pertain to your statement on Page 201 of the Testimony that "mass migrations at most amount to bulk porting situations. . . ."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

64. Please produce all documents that support, refer, relate, or pertain to your statement on Page 202 of the Testimony that "[t]oo many carriers already have faced too many obstacles to getting mass migrations accomplished by BellSouth in a reasonable manner."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

65. Please produce all documents that support, refer, relate, or pertain to the specific steps and processes that you believe are needed to perform mass migration of customers.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners also object to this Request on the ground that it seeks information that is within the possession, custody and control of BellSouth, and that Joint Petitioners cannot reasonably be expected to know all the methods and procedures required for placing mass migration orders in BellSouth's OSS system to which Joint Petitioners have never had access. On the basis of these objections, Joint Petitioners will not produce any documents.

66. Please produce all documents that relate, address, apply, or refer to your allegations on Page 203 of the Testimony that Xspedius once attempted "to accomplish mass migration of several special access circuits to UNE loops."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Joint Petitioners further object on the ground that information regarding requests for mass migration are in BellSouth's possession. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

The testimony referenced within this Request addresses solely the testimony of Xspedius; therefore, NewSouth does not have and will not be capable of producing responsive documents.

KMC Response:

The testimony referenced within this Request addresses solely the testimony of Xspedius; therefore, KMC does not have and will not be capable of producing responsive documents.

Xspedius Response:

Xspedius directs BellSouth's attention to email correspondence already in BellSouth's possession which involved communications between both parties regarding Xspedius' attempt to mass migrate special access circuits to UNE Loops.

67. Please produce all documents that support, refer, relate, or pertain to any instance in which you have billed BellSouth or another carrier for services rendered more than 90 days after the bill date on which those charges ordinarily would have been billed.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. The information sought in this Request is not relevant to the matter being arbitrated in Issue 7-1. On the basis of these objections, Joint Petitioners will not produce any documents.

68. Please produce all documents that support, refer, relate, or pertain to your statement on Page 213 of the Testimony that "[i]t is my understanding that the BFR/BNR process is a lengthy, expensive and typically unsatisfactory process."

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

69. Please identify all instances where you have used the BFR/BNR process with BellSouth.

OBJECTION: Joint Petitioners object to this Request on the grounds that it is vague, overly broad, and unduly burdensome. Joint Petitioners also object to the extent that this item seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or is beyond the scope of what is required under the Rules of Civil Procedure. Subject to and without waiving any objections, all non-privileged documents, if any, responsive to this request and in the possession of the Joint Petitioners will be produced in accord with the discovery guidelines mandated by this proceeding.

NewSouth Response:

After a diligent review of its records, NewSouth is unable to locate any documents in its possession, custody, or control that are responsive to this request and not otherwise publicly available to BellSouth. Given the ongoing nature of the discovery process, NewSouth reserves the right to amend or supplement this response should the circumstances warrant such action.

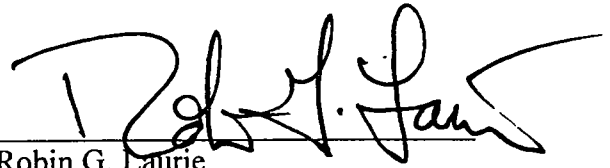
KMC Response:

KMC's search has not yet yielded responsive documents. KMC will continue its search and will produce expeditiously any documents that it finds.

Xspedius Response:

Xspedius search has not yet yielded responsive documents. Xspedius will continue its search and will produce expeditiously any documents that it finds.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robin G. Laurie", written over a horizontal line.

Robin G. Laurie
Balch & Bingham LLP
2 Dexter Avenue
P.O. Box 78
Montgomery, AL 36104
(334) 834-6500
(334) 269-3115 (facsimile)

John J. Heitmann
Stephanie A. Joyce
Garret R. Hargrave
KELLEY DRYE & WARREN LLP
1200 19th Street, N.W.
Suite 500
Washington, D.C. 20036
(202) 955-9600
(202) 955-9792 (facsimile)

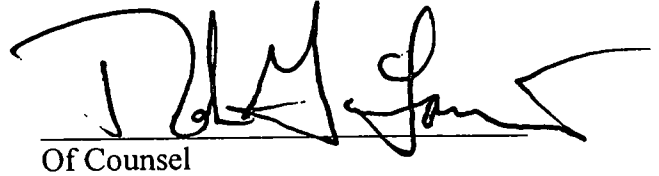
Attorneys for Joint Petitioners

Dated: June 29, 2004

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following
by U.S. Mail, properly addressed and postage prepaid, on this the 29th day of June, 2004:

Francis B. Semmes, Esq.
BellSouth
3196 Highway 280 South
Room 304N
Birmingham, Alabama 35243



Of Counsel

Joint Petitioners
Alabama Utilities Commission
Docket Nos. P-772, Sub 8 *et al.*
BellSouth's 1st Set of Request for Production
June 29, 2004

ATTACHMENTS TO REQUEST NO. 4

Msgs	Minutes	Jurisdiction	Month
3,005	8,663 67	InterLata	Jan-03
4,305,001	9,112,460 92	IntraLata	Jan-03
3,546	8,671 75	InterLata	Feb-03
4,133,045	8,652,746 52	IntraLata	Feb-03
3,968	9,570 90	InterLata	Mar-03
4,257,482	8,795,943 42	IntraLata	Mar-03
4,500	9,403 33	InterLata	Apr-03
4,884,946	10,010,467 20	IntraLata	Apr-03
4,958	10,453 55	InterLata	May-03
5,204,513	10,484,164 98	IntraLata	May-03
6,006	10,724 80	InterLata	Jun-03
5,127,105	10,383,614 93	IntraLata	Jun-03
8,264	17,504 95	InterLata	Jul-03
5,331,793	10,786,905 67	IntraLata	Jul-03
6,082	11,752 70	InterLata	Aug-03
5,404,696	11,015,517 93	IntraLata	Aug-03
404	951 15	InterLata	Sep-03
4,731,620	9,718,063 47	IntraLata	Sep-03
103	395 93	InterLata	Oct-03
1,106,738	2,227,770 40	IntraLata	Oct-03
481	1,243 22	InterLata	Nov-03
5,161,988	10,564,345 83	IntraLata	Nov-03
645	1,736 97	InterLata	Dec-03
5,953,404	12,085,107 72	IntraLata	Dec-03
844	2,126 25	InterLata	Jan-04
6,194,182	12,626,887 30	IntraLata	Jan-04
752	1,450 25	InterLata	Feb-04
6,030,409	12,274,255 98	IntraLata	Feb-04
929	2,077 95	InterLata	Mar-04
7,014,955	14,360,641 57	IntraLata	Mar-04
875	1,775 35	InterLata	Apr-04
6,554,143	13,127,056 80	IntraLata	Apr-04
3,813	7,430 90	InterLata	May-04
6,173,601	12,318,040 90	IntraLata	May-04
61	114 10	InterLata	Jun-04
60,880	131,943 67	IntraLata	Jun-04
87,679,737	178,781,982 93		

Msgs	Minutes	Jurisdiction	Month
48,118	90,404 62	InterLata	Jan-02
1,571,867	2,892,614 43	IntraLata	Jan-02

Joint Petitioners
Alabama Utilities Commission
Docket Nos. P-772, Sub 8 *et al*
BellSouth's 1st Set of Request for Production
June 29, 2004

ATTACHMENTS TO REQUEST NO. 14

**CONFIDENTIAL & PROPRIETARY & FILED UNDER SEAL
(NCS/NVX 000003)**

Joint Petitioners
Alabama Utilities Commission
Docket Nos. P-772, Sub 8 *et al.*
BellSouth's 1st Set of Request for Production
June 29, 2004

ATTACHMENTS TO REQUEST NO. 17

**CONFIDENTIAL & PROPRIETARY & FILED UNDER SEAL
(NCS/NVX 79-81; KMC0003-00029)**

Joint Petitioners
Alabama Utilities Commission
Docket Nos. P-772, Sub 8 *et al.*
BellSouth's 1st Set of Request for Production
June 29, 2004

ATTACHMENTS TO REQUEST NO. 42



BellSouth Telecommunications, Inc.
Customer Care
600 North 19th Street
12th Floor
Birmingham, Alabama 35203

Pattie Knight
Customer Support Manager

Pattie.Knight@BellSouth.com

April 5, 2004

Mr. John Fury
NewSouth Communications
2 North Main Street
Greenville, South Carolina 29601

Dear Mr. Fury:

This letter is in response to your request for an investigation and written response regarding the problems experienced by NewSouths' end user, Complete Colon Care (telephone number 843 763-3592). The following is the result of BellSouth's investigation:

On October 17, 2003 @ 9:46, BellSouth received Purchase Order Number (PON) NS36414JM, version 00, from NewSouth Communications the Local Service Request (LSR) was requesting that BellSouth port to NewSouth 15 telephone numbers 843-763-3592, 843 763-3635, 843 763-3892, 843 763-0455, 843 763-0547, 843 763-2375, 843 763-3979, 843 763-4171, 843 763-4515, 843 763-9387, 843 763-0176, 843 763-0251, 843 763-6137, 843 763-0247, 843 763-5284, and to disconnect 843 763-2516 and make 843 763-4088 the remaining main billing telephone number, requesting a due date of October 22, 2003.

On October 17, 2003 @ 13:39, this PON was clarified for an error in the end-user address

On October 17, 2003 @ 15:10, BellSouth received PON NS36414JM, version 01, from NewSouth Communications the LSR was requesting that BellSouth port to NewSouth 15 telephone numbers 843-763-3592, 843 763-3635, 843 763-3892, 843 763-0455, 843 763-0547, 843 763-2375, 843 763-3979, 843 763-4171, 843 763-4515, 843 763-9387, 843 763-0176, 843 763-0251, 843 763-6137, 843 763-0247, 843 763-5284, and to disconnect 843 763-2516 and make 843 763-4088 the remaining main billing telephone number, requesting a due date of 10/22/03. This version corrected the error on version 00 in the end-user address.

On October 20, 2003 @ 9:57, PON NS36414JM, version 01, was clarified back to NewSouth All numbers on Customer Service Record were not addressed on LSR.

On October 20, 2003 @ 11:14, BellSouth received PON NS36414JM, version 02, from NewSouth Communications.

On October 20, 2003 @ 11:57, BellSouth rejected this version, because it was illegible.

NSC/NVX 000004



Mr. John Fury
NewSouth Communications
Page Two
April 5, 2004

On October 20, 2003 @ 13:10, BellSouth received PON NS36414JM, version 02, sup 3, requesting modifications/corrections to the prior versions, from NewSouth Communications. This version of the LSR was requesting that BellSouth port to NewSouth 10 telephone numbers 843-763-3592, 843 763-0455, 843 763-0547, 843 763-2375, 843 763-3635, 843 763-3592, 843 763-3979, 843 763-4171, 843 763-4515, 843 763-9387, and make 843 763-4088 the remaining main billing telephone number and leave remaining telephone numbers with BellSouth, requesting a due date of October 22, 2003.

On October 20, 2003 @ 8:37, BellSouth issued a Firm Order Confirmation (FOC) to NewSouth Communications.

On October 21, 2003 @ 10:30, BellSouth received PON NS36414JM, version 03, sup 3, requesting modifications to the prior versions, from NewSouth Communications. This version of the LSR was requesting that BellSouth port to NewSouth 10 telephone numbers 843-763-3592, 843 763-0455, 843 763-0547, 843 763-2375, 843 763-3635, 843 763-3892, 843 763-3979, 843 763-4171, 843 763-4515, 843 763-9387, and make 843 763-4088 the main billing telephone number and leave remaining telephone numbers with BellSouth, and requesting a due date of October 24, 2003.

On October 21, 2003 @ 13:22, BellSouth issued an FOC to NewSouth Communications.

On October 21, 2003, BellSouth issued order CW98V6G0 with a due date of October 24, 2003.

The Subscription Version's (SV's) were created on October 21, 2003. The numbers were ported on October 29, 2003 and the "numbers ported" message was received by BellSouth at 15:60 that all the numbers had been ported. Since this was a partial port and a manual process the order fell out for manual handling. The service representative did not handle the order in a timely and accurate manner. The result was that the end-user was not receiving all of their incoming calls. The delay in handling the order has to be attributed to human error. The service representative has been re-educated.

BellSouth regrets any inconvenience this outage may have caused NewSouth and its end user, Complete Colon Care.

Sincerely,

Patie Knight,
Customer Support Manager

NSC/NVX 000005



BellSouth Telecommunications, Inc.
Customer Care
600 19th Street North
12/B3
Birmingham, AL 35203
John.Griffin@BellSouth.com

John Griffin
CWINS Support Manager

Phone 205-714-0491
Fax 205-321-3178

November 24, 2003

NewSouth Communications
Attention: John Fury

Reference: Conway Data

Mr. Fury:

This letter is in response to your request for an RCA (Root Cause Analysis) concerning your customer Conway Data and circuit 38/HCFU/737483.

On August 8, 2003 at 11:40 AM EDT a trouble was reported by NewSouth Communications and trouble ticket GI102998 was opened. The complaint was that NewSouth could not loop the Smart Jack. The CWINS (Customer Wholesale Interconnection Network Services) technician tested the circuit and referred trouble to both CO (Central Office) and outside forces. The technician in the CO found a cut jumper to a tie-pair. The circuit was restored on August 8, 2003 at 1:36 PM EDT.

On September 23, 2003 at 11:43 AM EST. NewSouth Communications reported the circuit down again. Trouble ticket GI105488 was opened by the CWINS center. Here the report was that the circuit was taking timing slips and errors. The CWINS technician tested the circuit and referred the trouble to the CO. The technician found a broken wire at the tie-pair.

Although it was the same tie-pair in each case, there were two different causes.

In GI102998 a cut jumper was found, which, most likely was due to technician error in working a disconnect unrelated to this circuit. The technician may have disconnected the wrong tie-pair.

In GI105488 a broken jumper was found, likely caused by activity in the area of the wiring point. In a congested wiring area, sometimes you must move bundles of existing wires in order to get to a particular wiring point. If a wire within the bundle is too tight, the stress of tugging and pulling on the bundle may break it. I believe this to be the case in the second trouble report.

The same technician worked both troubles and has been given feedback.

BellSouth regrets any inconvenience experienced by you or your customer.

Sincerely,

John M. Griffin
Customer Care
205-714-0491



BellSouth Telecommunications, Inc.

Customer Care
675 West Peachtree Street NE
29E40
Atlanta, Ga. 30375

July 1, 2003

John Fury
Carrier Relations Manager
NewSouth Communications
Greenville, SC. 29601

Dear John Fury,

This is in response to your May 12, 2003, request for an investigation with a written explanation regarding the premature disconnection of NewSouth Communications' end user, Briggs Industries Inc. (telephone number 865 523-1161). Following is the result of BellSouth's investigation:

On April 17, 2003, BellSouth's Local Carrier Service Center (LCSC) received a manual Purchase Order Number (PON) NS31465TL from NewSouth Communications requesting Local Number Portability (LNP) Full Conversion to port 7 telephone numbers, 865 523-1161, 523-1162, 523-1163, 523-1164, 523-1165, 523-1348, and 523-1765.

The BellSouth LCSC Service Representative who issued the service orders did not follow proper LNP order procedure. The Service Representative released the disconnect/port order with the incorrect due date. This caused the premature disconnection of telephone service for NewSouth Communications' end user, Briggs Industries Inc.

The Manager of the Service Representative who issued the service order has covered her on the proper LNP order process.

BellSouth regrets any inconvenience this may have caused NewSouth Communications' end user, Briggs Industries Inc. If you have additional questions concerning this issue, please contact me at 404 927-5230.

Sincerely,

A handwritten signature in black ink that reads "Vicki J. Vickers".

Vicki J. Vickers
Support Manager - Customer Appeals

NSC/NVX 000007



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

March 12, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to the formal request received on January 30, 2003, for an investigation and written explanation regarding the service outage associated with Ticket OC094178 (Circuit S 22/HFGS/401048/SB). Following are the results of Bellsouth's investigation:

On January 16, 2003 at 11:17 AM, the BellSouth Customer Facility Work Group received ticket, OC094178, indicating that circuit 22/HFGS/401048/SB, was out of service. Following the ticket a BellSouth Technician logged into the SONET Multiplexer in the Charlotte Boulevard Central Office saw a loss of signal alarm and sent a dispatch request to the Boulevard Office at, 11:23 AM. The BellSouth central Office Technician investigated the trouble dispatch and realized the circuit had been disconnected in error. The BellSouth Technician reinstalled Circuit 22/HFGS/401048/SB, and service was restored at, 11:54 AM.

The BellSouth Central Office Technician responsible for the disconnect in error has been covered on proper procedures for checking for service before disconnecting any circuit.

BellSouth regrets any inconvenience this action may have caused NewSouth or its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarello".

Andrew Caldarello

NSC/NVX 000008



BellSouth Telecommunications, Inc.

October 17, 2002

cc: Mark Pfeiler

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John:

This is in response to your request of August 22, 2002, regarding an investigation and written explanation of a service outage on circuit 40/HCFU/605695/SB experienced by NewSouth's end user, Supply Chain Management on trouble tickets GI-081992, GI-082189 and GI-082743. Following are the results of BellSouth's investigation.

At 7:36 AM on August 2, 2002, NewSouth contacted BellSouth's Customer Wholesale Interconnection Network Services (CWINS) Center to report a "circuit down" trouble. Trouble ticket GI-081992 was opened. At 7:44 AM trouble was handed off to the CWINS technician who was dispatched to the premises. At 9:26 AM the field technician repaired a bad smart jack, which restored the circuit. At 9:26 AM the CWINS center called NewSouth to advise that the circuit was restored. At 9:39 AM the trouble ticket was closed with Brad at NewSouth.

At 6:50 AM on August 6, 2002, NewSouth contacted the CWINS center to report a "circuit down" trouble. Trouble ticket GI-082189 was opened. At 8:37 AM the field technician called to advise the circuit was up when he arrived at the premises. Upon arrival the technician discovered a defective ground fault. He replaced carbons and cut the faulty cable. At 9:37 AM the trouble ticket was closed with Mike at NewSouth.

At 11:14 PM on August 14, 2002, NewSouth contacted the CWINS center to report a "circuit down" trouble. Trouble ticket GI-082743 was opened. The trouble was referred to the Chronic Maintenance Group for technical assistance since this was the third trouble reported this month. Preliminary tests on the circuit came back "clean" so a request for a field technician was made at 11:26 PM. On August 15, 2002, at 10:07 AM the field technician discovered the smart jack was flashing because the carbon pairs were not properly grounded. The carbon was pulled out and the cable pairs were soldered resulting in properly grounded clean pairs. The circuit was restored immediately and the ticket was closed out with Brad at NewSouth at 10:57 AM.

The service outage was not of a duration or frequency as to require an investigation. In the future BellSouth will only perform investigations of outages that exceed 150% of the Mean Time to Repair guidelines set forth in the BellSouth CLEC Maintenance Repair Guides

Sincerely,

A handwritten signature in cursive script that reads "Louise Conlin".

Louise Conlin
BellSouth Support Manager

NSC/NVX 000009



BellSouth Telecommunications, Inc.

October 17, 2002

cc: Al Cannon

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John:

This is in response to your request of August 19, 2002, regarding an investigation and written explanation of a service outage on circuit 30/HCGS/0023323/BS experienced by NewSouth's end user, Summit National Bank on trouble ticket CI071323. Following are the results of BellSouth's investigation.

On August 9, 2002, at 11:06 AM NewSouth contacted BellSouth's Customer Wholesale Interconnection Network Services (CWINS) Center to report a "circuit down" trouble. Trouble ticket CI071323 was opened. The circuit was tested and dispatched to a field technician. At 1:47 PM the field technician replaced a missing jumper, which restored the circuit. The CWINS center called NewSouth to advise that the circuit was restored. At 1:51 PM the trouble ticket was closed with Adrianna at NewSouth.

The service outage was not of a duration or frequency as to require an investigation. In the future BellSouth will only perform investigations of outages that exceed 150% of the Mean Time to Repair guidelines set forth in the BellSouth CLEC Maintenance Repair Guides.

Sincerely,

A handwritten signature in cursive script that reads "Louise Conlin".

Louise Conlin
BellSouth Support Manager

NSC/NVX 000010



BellSouth Telecommunications, Inc.

October 17, 2002

cc: Leslie Payer

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John,

This is in response to your request of August 28, 2002, for an investigation with a written explanation regarding a service outage experienced by NewSouth's end user, Norton Services. According to the data submitted on your Root Cause Analysis request form, (telephone number 803-502-1250 and the Purchase Order Number (PON) NS25857JM) the correct end user's name is Newman Technology South. Following are the results of BellSouth's investigation.

On August 21, 2002, NewSouth faxed a Local Service Request (LSR) on PON NS25857JM. A service order CWDDF399 was issued to port twenty telephone numbers to NewSouth with a due date of August 22, 2002. On August 23, 2002, service order DWNG8639 was issued to disconnect the twenty telephone numbers from BellSouth's switch. The order completed on August 23, 2002 and the end user experienced the service outage. Service order DW7BY9B8 was issued, due dated and completed on August 27, 2002. This order restored the customer's service.

The investigation identified the premature processing of the disconnect service order as the cause of the service outage experienced by Newman Technology South on August 23, 2002. The service representative who processed the orders negligently failed to due date the orders in accordance with proper porting procedures. The LCSC manager has covered the service representative on correct porting protocol.

BellSouth regrets any inconvenience this may have caused NewSouth and it's end user, Newman Technology South. I trust this response addresses your concerns regarding this service outage.

Sincerely,

A handwritten signature in cursive script that reads "Louise Conlin".

Louise Conlin
BellSouth Support Manager

NSC/NVX 000011



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

September 3, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 17, 2002, containing multiple requests related to NewSouth outages and BellSouth Translations Processes. In your email you provided six requests and in addition requested a meeting with LISC/NISC Management for your Director of Network Operations, Mark Pfeiler. BellSouth was pleased to respond to all six requests during our visit to NewSouth Headquarters in Greenville, South Carolina on the mutually agreed upon date of August 7, 2002.

During our meeting BellSouth provided the following in an effort to respond to your six requests:

- An overview of LISC/NISC Procedures via a presentation of Job Aids, Switch Translations Steps To Success and an Overview of the Translations Validation Process. Also, a monthly status report has been agreed to and an initial copy provided subsequently of the percentage completion of the Translations Validation Project.
- Multiple contact personnel within BellSouth responsible for Translations and Trunking Projects.
- A commitment BellSouth will make a best effort to provide NewSouth notification of any Translations Projects affecting NewSouth Independently.
- A region wide initiative referenced as, "Switch Translations. Steps To Success" aimed at improving Translations Processes.
- BellSouth provided requested investigation results via formal written response.
- An assignment of Rick Lagrange as a Single Point of Contact to work with NewSouth on Translations Issues

In addition, BellSouth worked to achieve an open dialogue and exchange of information in an effort to produce a productive and results oriented meeting.

NSC/NVX 000012

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Caldarelo", with a long horizontal flourish extending to the right.

Andrew Caldarelo



BellSouth Telecommunications, Inc.

August 30, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John,

This is in response to your August 13, 2002, request for an investigation with a written explanation regarding the service outage experienced by NewSouth's end user, Exopack for telephone number 864-596-7140. Following are the results of BellSouth's investigation.

BellSouth's investigation has identified several contributing factors that resulted in both service outages experienced by Exopack. The first factor was proper notification was not communicated by the BellSouth service representative who processed the initial service orders to the project manager responsible for overseeing the porting procedures. The second factor was the service representative failed to establish a correct due date on the orders according to proper porting procedures which caused the first service outage on July 30, 2002. The third factor was the repair technician prematurely worked the disconnect order before the porting order was complete which caused the service outage on August 7, 2002.

The BellSouth service representative who issued the orders has been covered by her manager on the proper procedures for both establishing due dates porting orders and project management notification.

BellSouth regrets any inconvenience this may have caused NewSouth and it's end user, Exopack. If you have additional questions concerning this issue, please contact me at (404) 927-2075.

Sincerely,

A handwritten signature in cursive script that reads "Louise Conlin".

Louise Conlin
Support Manager - BellSouth

NSC/NVX 000014



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

August 13, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 22, 2002, requesting an investigation and a written explanation regarding the service outage associated with BellSouth Ticket number OG108245. Following are the results of Bellsouth's investigation:

On July 19, 2002 at 11:07 AM, NewSouth contacted the BellSouth Access Customer Advocate Center (ACAC) reporting "Circuit Dead, circuit bouncing/IC clean to Smart jack" for facility 40/HCGS/603352. At 11:14 AM, a BellSouth generated auto-test showed, "trouble indicated by signal at the POI (Point of Interface). At 11:19 AM, BellSouth ACAC advised NewSouth that facility tested "okay" to the MU. At 11:34 AM, BellSouth ACAC Technician looped HRU and the circuit began dropping.

At 11:40 AM, BellSouth ACAC Technician requested an "outside technician be dispatched". At 12:27 PM, Bruce with NewSouth requested an escalation. The BellSouth Outside Plant Technician was dispatched at 12:36 PM. Once dispatched the BellSouth Technician changed HLU to match the manufacturer of HRU. The BellSouth technician then proceeded to monitor the circuit for approximately 35 minutes with Bruce at NewSouth and the circuit ran clean for that period. Bruce with NewSouth advised BellSouth that the ticket could be closed.

At 3:00 PM BellSouth ACAC, called Jim with NewSouth at which time Jim requested that ticket OG108245 be left open for monitoring until Monday, July 22, 2002. After no further trouble was identified, the ticket was closed on July 22, 2002 at 1:10 PM.

Upon review and investigation there appears to have been a compatibility issue between units manufactured by two alternate vendors. BellSouth is currently conducting field trials in several BellSouth Service Areas to further investigate and determine the parameters of this issue.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarello".

Andrew Caldarello

NSC/NVX 000015



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

August 5, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 17, 2002, requesting an investigation and a written explanation regarding the service outage experienced by NewSouth on, 19 NPA/NXXs, out of the Caldwell and Boulevard Tandem on May 21, 2002. Following are the results of Bellsouth's investigation:

On May 21, 2002 at 10:00 AM, a BellSouth Technician was performing a routing validation project in the Caldwell 5ESS Local Tandem Central Office. While performing this project, the BellSouth Technician incorrectly directed the NewSouth calls to a route index that deleted three digits. This was in error of Charlotte's mandatory 10 digit routing.

NewSouth's Dave Grayson was aware of the validation project underway through an email notification sent earlier in May from BellSouth's David Fulwood. Shortly after the error occurred Dave Grayson, with NewSouth, called the NISC direct and spoke with the BellSouth Technician who made the changes. Upon speaking with Dave Grayson the BellSouth Technician immediately began routing traffic back to end office, which corrected the trouble.

At 10:26 AM, ticket IL014276 was opened to the BellSouth NISC. NewSouth reported number could not be called from Sharon Amity Central Office.

At 11:05 AM, all changes in translations were complete and all calls were routing correctly.

At 11:31 AM, BellSouth NISC closed Ticket IL014276.

Following the outage, the BellSouth Technician working this validation project was immediately reviewed on the procedures and importance of performing end-to-end verification after performing routing changes. Also, all BellSouth 5ESS Technicians in the associated center have been reviewed on the procedures around successful translations projects.

BellSouth's Translations Manager contacted David Grayson of NewSouth prior to making the call routing verification change referenced above. This communication contributed to minimal duration outage experienced by NewSouth.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarelo".

Andrew Caldarelo

NSC/NVX 000016



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

August 5 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 2, 2002, requesting an investigation and a written explanation regarding the service outage experienced by NewSouth on NPA/NXX, 704-926 on July 1, 2002. Following are the results of BellSouth's investigation:

On July 1, 2002 at 4:20 PM, NewSouth's David Grayson called BellSouth's Translations Manager, David Fulwood to report a trouble that NewSouth was "unable to receive calls on two Two-Six Codes (TSC) in the Charlotte, NC Boulevard Tandem. Mr. Fulwood requested that NewSouth open a trouble ticket with the BellSouth Local Interconnection Service Center (LISC) in order to have the trouble isolated. At 4:20 PM, Kevin with NewSouth called the LISC to report a trouble of "LD (Long Distance) number 864-672-5000 could not call LNP number 704-372-5625." Trouble ticket IL015769 was opened. At 4:35 PM, the LISC referred the trouble to BellSouth's Network Infrastructure Support Center (NISC) to isolate the trouble. On this ticket there were three TSCs provided, AC226231, located in Caldwell Street Central Office (CO) and AC216897 and AC217011, located in the Boulevard tandem.

At 5:45 PM, at the request of NewSouth, BellSouth's Translation Manager, Tim Axe, initially looked for all translations packets downloaded in Boulevard tandem. Upon completion of this function, Mr. Axe determined that the Boulevard Tandem was not the cause of the call blocking. Mr. Axe then performed a tracer on incoming calls with the digits 704-926-1900 in the Caldwell Tandem. It was determined that calls were being blocked because of a translation error made by a BellSouth Electronic Technician in NewSouth's NPA/NXX 704-926. At 6:10 PM, the translation error was corrected. BellSouth and NewSouth made successful test calls. The trouble ticket was put in delayed maintenance pending further investigation, and subsequently closed with NewSouth

BellSouth Electronic Technicians are required to follow specific verification procedures in order to insure correctness of the specific project. BellSouth has reviewed this process requirement with the entire Charlotte Translations Work Group in an effort to prevent any future outages of this type.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarelo".

Andrew Caldarelo

NSC/NVX 000017



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

August 5, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 17, 2002, requesting an investigation and a written explanation regarding the service outage experienced by NewSouth in Spartanburg on July 8, 2002. Following are the results of Bellsouth's investigation:

On July 8, 2002 at 3:00 PM, NewSouth contacted BellSouth requesting a ticket be opened for trouble experienced by a NewSouth End User who could not receive calls from a Chesnee Telephone Company End User. BellSouth Ticket IL015819 was opened at the request of Brandi with NewSouth.

An investigation revealed that Chesnee Telephone Company was routing CLEC Traffic to the Spartanburg Local Tandem, rather than the Greenville Equal Access Tandem as prescribed. At the time BellSouth installed a look up of last resort trunk group in Spartanburg and rerouted the Chesnee Telephone Company CLEC traffic, the trunk group began to block.

Once the problem was identified, BellSouth overflowed misrouted Chesnee CLEC Traffic to the Spartanburg/Greenville Tandem. Upon completion of this function, all CLEC traffic from Chesnee began to complete.

At 4:36 PM, BellSouth closed out Ticket IL015819 with Brandi of NewSouth Communications.

All CLEC traffic was affected by the outage that occurred on July 8, 2002, with Chesnee Telephone Company. Chesnee Telephone Company has been notified and is in the process of ordering additional trunks to the Greenville Tandem.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarello".

Andrew Caldarello

NSC/NVX 000018



BellSouth Telecommunications, Inc. Fax
Interconnection Services
800 North 19th Street
9th Floor
Birmingham, AL 35203

August 5, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of July 17, 2002, requesting an investigation and a written explanation regarding the service outage experienced by NewSouth on NPA-NXX Codes 251-544 and 251-650. Following are the results of Bellsouth's investigation:

On July 16, 2002 at 11:14 AM, NewSouth's Kevin called BellSouth reporting all ported numbers failing through MOBLALAZ0GT. BellSouth Trouble Ticket NL010889 was opened at the request of NewSouth.

An investigation revealed the trouble was generated within the BellSouth NISC CTG. A BellSouth Technician working an unrelated trouble ticket deleted 3 digits from standard 10-digit delivery on a Standard Pretranslator (STDPRCT) shared with NewSouth LNP Response Translations. The BellSouth Technician was unaware that this was a shared STDPRCT facility with NewSouth and would affect NewSouth Traffic.

In order to prevent future outages of this type BellSouth is issuing a Job Aid requiring verification of all services that route over a STDPRCT before any changes to digits delivered are made. BellSouth is also requiring testing before and after any changes are made and will not allow changes if it will affect other customers.

At 5:14 PM, BellSouth closed out Ticket NL010891 with Kevin at NewSouth.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarello".

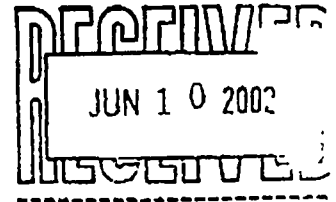
Andrew Caldarello

NSC/NVX 000019

Al Cannon
Eddie Tarrell
Janet Funder
Annie McFall



BellSouth Telecommunications, Inc. Fax
Interconnection Services
800 North 19th Street
9th Floor
Birmingham, AL 35203



June 5, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated May 22, 2002, requesting an investigation and a written explanation regarding the service outage experienced by NewSouth on circuit, 34/HFGS/400405/SB. Following are the results of Bellsouth's investigation:

On May 21, 2002 at 7:29 AM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC) to report a trouble of "T3 down for 34/HFGS/400405/SB." Trouble ticket OC087252 was opened. At 7:31 AM, the ACAC technician discovered that there was no remote test points for this circuit and requested a dispatch to the Columbia, South Carolina Senate Street Central Office (CO). At 7:51 AM, a BellSouth technician was dispatched to the Senate Street CO.

At 8:06 AM, Tim with NewSouth called the ACAC to request status. Status was provided. At 8:13 AM, the CO technician removed a looping plug from the DSX3. This action restored the circuit. At 8:19 AM, the ACAC advised Chad at NewSouth of restoral. Chad concurred that he had seen circuit "come back up". At 8:26 AM, the ticket was closed with NewSouth.

The service outage to the circuit was caused by a BellSouth CO technician inadvertently going to the wrong bay/circuit and completing a request for a loop on a circuit. As an initiative to prevent future errors of this nature, the CO supervisor has covered this technician on the appropriate procedures. The necessary coding was made on the ticket closeout to reimburse NewSouth for the outage.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarello".

Andrew Caldarello

NSC/NVX 000020

Al Cannon
Eddie Terrell

BELL SOUTH

Montgomery DS3 Outages

BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

May 30, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated May 3, 2002, for an investigation and a written explanation regarding the service outage of NewSouth's circuits A3/HFGS/575645/SC and A3/HFGS/575642/SC on April 22, 2002. Following are the results of BellSouth's investigation:

On April 22, 2002 at 3:05 PM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC) to report a trouble of "circuits down" for A3/HFGS/575645/SC and A3/HFGS/575642/SC. Trouble tickets OW058106 and OW058107 were opened respectively. At 3:07 PM, the ACAC referred the trouble tickets to the Work Management Center (WMC), requesting a dispatch to the Central Office (CO). At 3:20 PM, a CO technician picked up the trouble tickets. At 4:02 PM, Brad with NewSouth called the ACAC to request a first-level escalation. At 4:08 PM, the CO technician discovers a mismatch between the two ends of the circuits.

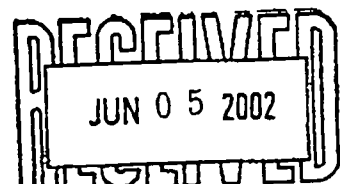
At 4:18 PM, the ACAC called NewSouth and provided Larry with a current status report. Larry advised that the circuits are still down. Larry requested that BellSouth hold the ticket open until NewSouth contacts International Fiber Network (IFN). At 4:38 PM, Charles with BellSouth, Larry with NewSouth and Jonathan with IFN are conferenced together in an attempt to isolate the trouble on the circuits. At 4:42 PM, Larry requested a second-level escalation. At 5:15 PM, the IFN technician advised the ACAC that he was of the opinion that the trouble was between IFN and BellSouth. At 5:20 PM, Jack with NewSouth called the ACAC to request a third-level escalation. At 5:33 PM, the BellSouth CO technician determined that another BellSouth CO technician while working a service order for another customer had inadvertently removed the card/slots for NewSouth's circuits, which caused the service outage. The necessary corrections were made, which restored both circuits. At 5:41 PM, the tickets were closed with NewSouth.

As to your request for compensation to cover the service outage for circuits, A3/HFGS/575645/SC and A3/HFGS/575642/SC, BellSouth has credited \$1,708.29 and \$1,590.00 respectively to NewSouth's May, 2002 bill.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-4979.

Sincerely,


Andrew Caldarello



NSC/NVX 000021



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

May 15, 2002

Mr. John Fury
Manager, Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your verbal request of April 30, 2002, for an investigation and a written explanation of the recent trouble reporting history of NewSouth's OC48 SmartRing in Charlotte, NC for circuit number NN470G. Following are the results of BellSouth's investigation:

On April 11, 2002 at 5:30 PM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC) to request "monitoring" for NewSouth's OC48 SmartRing in Charlotte, NC. Trouble ticket OC086237 was opened for monitoring purposes. Even though monitoring indicated that the circuit was running "clean", BellSouth held the ticket open until April 12, 2002, at the request of Adriana with NewSouth.

On April 12, 2002 at 9:31 AM, the ticket was closed with NewSouth.

On April 17, 2002 at 10:40 AM, NewSouth called the ACAC to request that the "Protect Timing Card be checked." Trouble ticket OC086382 was opened. The ticket was referred to the Central Office (CO) to check the Protect Timing Card. The CO technician advised that one of the Protect Timing Cards had been changed the previous day. Pauline with NewSouth requested that the other Protect Timing Card be changed also. At 3:11 PM, the card was changed and the ticket was closed with Windsor at NewSouth.

The event history in the multiplexer indicated no activity that was service impacting.

If NewSouth believes that trouble exists on the SmartRing, BellSouth is available to assist in isolation efforts. If you have any additional questions, please call me at 205-321-4979.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Caldarelli".

Andrew Caldarelli
BellSouth Interconnection

NSC/NVX 000022



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

May 8, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John:

This is in response to your e-mail of September 25, 2001, requesting an investigation and a written explanation regarding the service interruptions experienced by NewSouth's end users in Mobile, Alabama. I apologize for the delay in responding to your request.

Please refer to the attached BellSouth letter to the Alabama Public Service Commission (PSC), which was written in response to a letter sent to the commission by NewSouth. The letter provided the PSC with the results of BellSouth's investigation into the service interruptions experienced by NewSouth and its end users in Mobile, Alabama.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have any additional questions, please call me at 205-321-7730.

Sincerely,

Scott Christian

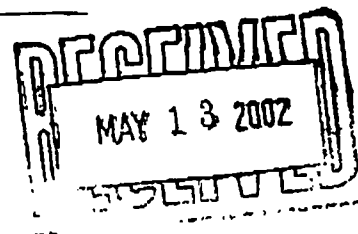
Scott Christian
Regional Account Manager

Attachment

NSC/NVX 000023



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203



May 8, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth
Two North Main Street
Greenville, SC 29601

Dear John:

This is in response to your e-mail of November 15, 2001, requesting an investigation with a written explanation regarding the service outages experienced by NewSouth's end user, Entercom on trouble tickets C-028276, CI028229 and CI053854. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On October 31, 2001 at 3:20 PM, NewSouth called BellSouth's Customer Wholesale Interconnection Network Services (CWINS) Center to report a trouble of "circuit down again." Trouble ticket CI053854 was opened. At 3:47 PM, after testing, the CWINS technician requested a dispatch to the end user's premises. At 3:54 PM, the trouble was referred to the Chronic Maintenance group for technical assistance. At 5:15 PM, the field technician repaired the cable pair, which restored the circuit. At 5:33 PM, the CWINS called NewSouth to advise that the circuit was restored. John with NewSouth advised that the circuit was still in alarm. NewSouth advised they were dispatching a technician to the end user's premises. At 6:19 PM, the CWINS technician called NewSouth and was advised that circuit was working. At 6:28 PM, BellSouth's field technician was conferenced with John and Roger with NewSouth who advised that circuit was working and that NewSouth determined that the circuit was locked out by the switch in the transmitting station in the end user's network. At 6:38 PM, the ticket was closed with John at NewSouth.

Beginning October 29, 2001, and continuing for thirty days, BellSouth monitored the circuit and had only two errored seconds between NewSouth and Entercom and at the end of thirty days, Adriana with NewSouth advised the CWINS that there had been no further troubles.

BellSouth has searched its systems and cannot locate any records of trouble tickets CI028276 and CI028229.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. If you have any additional questions, please call me at 205-321-7730

Sincerely,

Scott Christian

Scott Christian
Regional Account Manager

NSC/NVX 000024



BellSouth Telecommunications, Inc.

March 28, 2002

Mr. John "Fury"
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of February 1, 2002, requesting an investigation and a written explanation regarding the interruption of service experienced by Sysco Louisville Food Services during the port its local telephone service from BellSouth to NewSouth. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On January 7, 2002, the BellSouth Local Carrier Service Center (LCSC) received Purchase Order Numbers (PON) NS20647TL and NS20650TL from NewSouth to port the local telephone services of Sysco Louisville Food Services from BellSouth to NewSouth. PON NS10647TL requested that 440 numbers associated with telephone number 502-364-4300 be ported to NewSouth, and PON NS20650TL requested that 16 numbers associated with telephone number 502-367-6131 be ported to NewSouth. The desired due date for the two related PONS was January 16, 2002.

On January 8, 2002, PON NS10647TL was returned for clarification because of incorrect data in the Type of Service (TOS) field. As PON NS10650TL was related, it was also returned for clarification.

On January 9, 2002, NewSouth returned PONs NS10647TL and NS10650TL, Version 1, Sup 3, with the correct information. On the same day, the LCSC issued the trigger order (C4RJM161) for the two PONs. The LCSC also issued listing order (N4B6X227) and disconnect order (D4LKH192) to transfer the 440 telephone numbers requested in PON NS10647TL, and listing order (N4BQP467) and disconnect order (D4H9Q349) to transfer the 16 telephone numbers requested in PON NS10650TL. The LCSC issued a Firm Order Confirmation with a due date of January 16, 2002.

NSC/NVX 000025

Mr. John Fury
Page Two
March 28, 2002

On January 16, 2002 at 9:40 AM, NewSouth advised the BellSouth project manager that the port would not take place on January 16, 2002, as scheduled. The project manager was successful in stopping the process before the orders completed.

On January 18, 2002, the LCSC received PONs NS10650TL and NS10647TL, Version 2, Sup 2, requesting a due date change to January 29, 2002. As is BellSouth's procedure, the service representative set the due date on disconnect order (D4LKH192) for the 440 telephone lines to complete after the telephone numbers were successfully ported. However, the due date on disconnect order (D4H9Q349) for the 16 telephone numbers was inadvertently issued for January 29, 2002, the same date the numbers were to be ported to NewSouth.

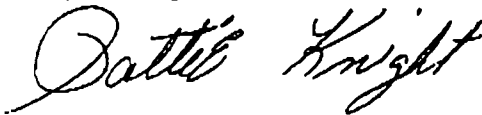
On January 29, 2002 at 1:45 PM, NewSouth notified the BellSouth project manager that the 16 telephone numbers on PON NS10650TL were out of service. An investigation revealed that the disconnect order D4H9Q349 to port 16 telephones numbers completed through the systems, causing the interruption of service for Sysco Louisville Food Services for these 16 telephone numbers. The project manager immediately began to work with the LCSC to restore the service. At 5:09 PM, all the telephone numbers, including the 16 telephone numbers that had been prematurely disconnected, successfully ported to NewSouth.

As to your claim for compensation for damages that NewSouth's end user may have suffered, please be advised that the Interconnection Agreement executed between BellSouth and NewSouth governs such claims. The contract does not authorize a claim such as the one set forth in your e-mail.

BellSouth regrets any inconvenience this service interruption may have caused NewSouth and its end user.

If you have any additional questions, please call me at 205-714-0089.

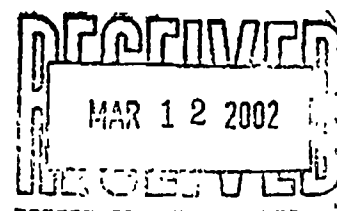
Sincerely,

A handwritten signature in cursive script that reads "Pattie Knight". The signature is written in black ink and is positioned above the printed name and title.

Pattie Knight,
Customer Support Manager



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203



March 6, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your verbal request of May 5, 2001, for an investigation and a written explanation regarding the interruption of service experienced by NewSouth on trouble ticket GI051645 for Providence Hospital. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On May 3, 2001 at 11:02 AM, NewSouth called the Customer Wholesale Interconnection Network Services (CWINS) Center to report a trouble of "telephone number 334-633-1000 cannot be called from BellSouth telephone number 678-417-5630, reach a recording to dial 1 or 0, LRN 334-544-9995." Trouble ticket GI051645 was opened. At 11:28 AM, after verifying that 334-633-1000 was a ported telephone number for NewSouth, the CWINS technician referred the ticket to BellSouth's Network Infrastructure Service Center (NISC) to isolate the trouble. At 12:24 PM, the CWINS called Brandy at NewSouth to provide status. Brandy requested a first level escalation for the NISC. At 12:27 PM, a first level escalation was requested.

On May 3, 2001, at 12:43 PM, a NISC technician advised the CWINS that 334-633-1000 was a 1 + call from Alabama to Duluth, Georgia. At 12:47 PM, the CWINS called Brandy with NewSouth to advise of the NISC findings. Brandy requested that the ticket be placed in a delayed maintenance status.

On May 4, 2001 at 12:55 PM, the trouble ticket was closed as with NewSouth.

If you have any additional questions, please call me at 205-321-7730.

Sincerely,

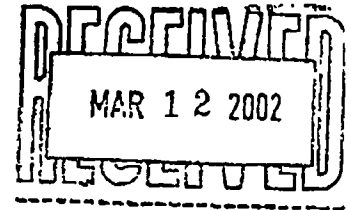
Scott Christian

Scott Christian

NSC/NVX 000027



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203



March 5, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of August 31, 2001, requesting an investigation and a written explanation regarding the interruptions of service experienced by NewSouth on trouble tickets SI016347 and SI016838 for its end user, Mississippi Hospital Associates. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

SI016347

On August 15, 2001 at 12:59 PM, Van with NewSouth called BellSouth's Fleming Island Customer Wholesale Interconnection Network Services (CWINS) Center to report a trouble of "NewSouth Ported TN 601-368-3356 cannot be called by BellSouth's telephone number 601-483-1562." Trouble ticket SI016347 was opened. At 2:29 PM, after testing the lines and working with the Local Carrier Service Center (LCSC), the technician determined that 601-368-3356 was a ported telephone number for NewSouth, however, because a LCSC service representative issued the port out service order incorrectly, telephone number 601-368-3356 was inadvertently assigned to a different BellSouth customer. At 3:55 PM, the CWINS technician requested that the LCSC issue a correction service order to remove 601-368-3356 as an assignable telephone number from BellSouth's switch. At 3:59, the CWINS called Van at NewSouth with the resolution to the interruption of service. Van requested that the ticket be placed in a delayed maintenance status for 24 hours.

On August 16, 2001 at 4:13 PM, the CWINS technician closed the ticket with Van at NewSouth.

SI016838

On August 29, 2001 at 1:26 PM, Van with NewSouth called the Fleming Island CWINS Center to report a trouble of "NewSouth Ported TN 601-368-3356 cannot be called by other BellSouth customers." Trouble ticket SI016838 was opened. At 1:42 PM, after testing the lines and working with BellSouth's Business Repair Center (BRC), to check the service order and verify if telephone number 601-368-3356 had been reassigned to another BellSouth customer. At 1:46 PM, the BRC confirmed that the number was reassigned to a different BellSouth customer. The BRC advised the CWINS that there was a service order generated on August 15, 2001, to resolve the problem on trouble ticket SI016347. There is no documentation to explain the reason the service order that was issued and completed by the LCSC on August 15, 2001, failed to correct the problem. The service order has since been purged from BellSouth's Service Order Control System (SOCS).

NSC/NVX 000028

March 5, 2002
Mr. Fury
Page 2

The technician in Fleming Island called the Atlanta CWINS Local Number Portability (LNP) Group and was advised that Van at NewSouth will need to refer a trouble of this nature directly to the Atlanta CWINS LNP Group for resolution. At 3:20 PM, the CWINS technician called Van at NewSouth and left a voice message to advise of special handling procedure for this type of trouble. At 3:28 PM, the ticket was cancelled and related to the previous ticket, SI016347. Due to the age of this trouble ticket, there is no further documentation to support the time the trouble was cleared.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user.

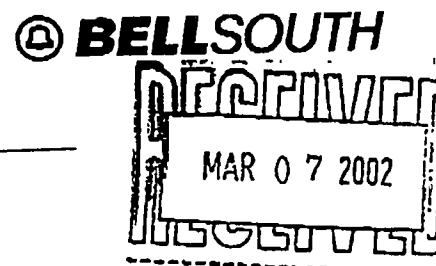
I am investigating the service interruptions for Providence Hospital Services and will provide a written explanation as soon as possible. I understand that on September 20, 2001, Rick Alvis provided a response to the service interruptions for Georgia Medical Care Foundation.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. Please feel free to call me at 205-321-7730, if there are additional questions.

Sincerely,

Scott Christian

Scott Chnstian



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

February 28, 2002

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mails dated January 21 and February 4, 2002, requesting an investigation and a written explanation regarding the interruption of service experienced by NewSouth's end user, Providence Hospital, on January 7, 2002. Following are the results of BellSouth's investigation:

Trouble Ticket No. ZW046524:

On January 7, 2002 at 6:42 PM, NewSouth called the Access Customer Advocacy Center (ACAC) to report a trouble of "Local Routing Number (LRN) should be 251-544-9995." Trouble ticket ZW046524 was opened. At 6:44 PM, the ACAC referred the trouble to BellSouth's Network Infrastructure Support Center (NISC) to isolate and repair the trouble. At 7:48 PM, the NISC advised the ACAC that NewSouth would need to change the LRN from NPA 334 to the new NPA of 251. At 8:58 PM, the ACAC called Kevin at NewSouth to request that the routing index for 334-633-1900 be changed to 251-633-1900. Kevin agreed to make the change. At 8:59 PM, the ticket was closed with Kevin at NewSouth.

A further investigation revealed that the cause of this trouble was as a result of BellSouth not having all NPA NXXs that were involved in the 334 to 251 NPA split defined in its internal Local Number Portability (LNP) system tables. Consequently, for the affected code, in BellSouth's databases, numbers ported to NewSouth had an LRN with an invalid NPA of 334.

To avoid such situations as this one in the future, BellSouth has implemented the following corrective action:

- 1) Identified the best available source for identifying all NPA NXXs for all Service Providers involved in an NPA Split to ensure that all affected codes are known.

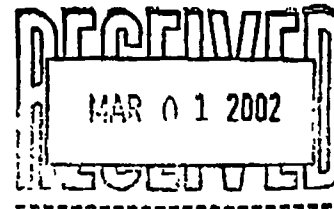
- 2) Implemented additional check points to assist in adding all NPA NXXs involved in an NPA Split to BellSouth's internal LNP system tables. BellSouth is also performing follow-up manual checks to identify any outstanding relevant code issues in BellSouth's LNP system, including those addressable by BellSouth and those requiring action by another Service Provider. BellSouth will make contact with other Service Providers as appropriate to initiate any required activities. BellSouth will continue to rely on industry input into the Local Exchange Routing Guide (LERG) as well as NPA Split processes with the Number Portability Administration Center (NPAC) to drive some of these functions in BellSouth systems. This necessary input is not within the control of BellSouth.

NSC/NVX 000030



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

February 20, 2002



Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated November 12, 2001, requesting an investigation and a written explanation regarding the interruptions of service experienced by NewSouth on trouble tickets OW054527, KI020488 and KI020755 for circuit A3/HCFU/583739/SC. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On October 7, 2001 at 8:34 AM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC) to report a trouble of "circuit down." Trouble ticket OW054527 was opened. The ACAC determined that BellSouth was in the process of converting this circuit from a Special Access circuit to an Unbundled Network Element (UNE) circuit. The initial tests performed by the ACAC revealed that the circuit was not yet converted and that a Yellow Signal was coming from NewSouth's collocation direction. The ACAC was able to test to the High Gain Line Unit (HLU), however, he was unable to loop back to the High Gain Remote Unit (HRU). The ACAC requested a dispatch of a field technician to the Remote Terminal (RT).

On October 8, 2001 at 8:40 AM, the field technician reset the HLU. This action restored the circuit. At 8:57 AM, NewSouth was provided status. At 10:37 AM, the ticket was closed with NewSouth.

On October 12, 2001 at 4:06 PM, NewSouth called the Customer Wholesale Interconnection Network Services (CWINS) Center to report trouble of "circuit down." Trouble ticket KI020488 was opened. The initial test made by the CWINS revealed that a Yellow Signal was coming from NewSouth's collocation direction, circuit was down from the end user's direction and the technician was unable to loop back to any components from the field. The CWINS requested the dispatch of a field technician to the RT. At 7:15 PM, the field technician replaced the Fiber Repeater. This action restored the circuit. At 8:04 AM, NewSouth was provided status. At 10:33 AM, the ticket was closed with NewSouth.

On October 29, 2001 at 8:34 AM, NewSouth called the CWINS Center to report a trouble of "circuit down." Trouble ticket KI020755 was opened. The initial test made by the CWINS revealed that a Yellow Signal was coming from NewSouth's collocation direction, circuit was down from the end user's, and was unable to loop back to the HRU and the Customer Service Unit (CSU). The CWINS requested the dispatch of a field technician to the RT. At 10:58 AM, the field technician replaced the HRU. This action restored the circuit. At 11:05 AM NewSouth was provided status. At 11:16 AM, the ticket was closed with NewSouth.

NSC/NVX 000031



February 20, 2002
Mr. Fury
Page 2

On October 29, 2001 at 9:05 AM, the CWINS opened a chronic trouble ticket KI020757 for the purpose of monitoring the circuit.

On November 29, 2001, after thirty days the chronic trouble ticket was closed because there was no further trouble reported on the circuit.

BellSouth regrets any inconvenience this may have caused NewSouth and its end users. If you have additional questions, please call me at 205-321-7730.

Sincerely,

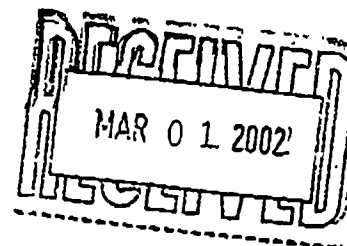
Scott Christian

Scott Christian

NSC/NVX 000032



BellSouth Telecommunications, Inc Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203



February 19, 2002

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of January 10, 2002, requesting an investigation and a written explanation regarding the interruptions of service experienced by NewSouth's end user, Anderson Independent Mail on circuit 30/HCGS/404589/SB. Following are the results of BellSouth's investigation:

On December 28, 2001 at 5:39 PM, NewSouth called the Access Customer Advocacy Center (ACAC) to report a trouble of "circuit is down, can't loop Smart Jack." Trouble ticket OC083343 was opened. At 5:46 PM, the ACAC referred the trouble to the Work Management Center (WMC) for dispatch to the remote terminal to isolate trouble. At 6:03 PM, the WMC requested the dispatch of a field technician to the remote terminal. At 6:31 PM, the field technician was dispatched. At 7:53 PM, the field technician advised the ACAC that Loop2 on the circuit was down. The field technician repaired a broken jumper. At 8:07 PM, the field technician changed the High Gain Remote Unit (HRU), however, the equipment was still in alarm. At 8:23 PM, the local contact, Bill Bussey reset the equipment and the alarms cleared. This action cleared the trouble. At 9:11 PM, David with NewSouth requested to leave the ticket in a delayed maintenance status. In addition, David requested a vendor meeting for January 2, 2002 at 9:00 AM. At 9:33 PM, the ticket was closed with David. The ACAC opened trouble ticket OC083347 for the vendor meeting.

On January 2, 2002, a field technician was dispatched to meet with the vendor at the end user's premises with an estimated time of arrival of 8:45 AM. At 9:03 AM, Jim with NewSouth called the ACAC for status. At 9:53 AM, Jim called again for status. It appears that the field technician was at the remote terminal pulling Performance Monitoring (PM) data. At 10:47 AM, the field technician met with John at NewSouth and advised him that no trouble had occurred on circuit since December 28, 2001. The field technician made the decision to change the F2 cable pairs, however, the end user would not release the circuit until 7:00 PM.

On January 2, 2002 at 2:54 PM, Adrianna with NewSouth called the ACAC to report a trouble of "circuit down again." The field technician was still at the end user's premises. At 4:10 PM, the cable pairs were changed. This action restored the circuit.

NSC/NVX 000033

February 19, 2002
Mr Fury
Page 2

On January 3, 2002 at 12:16 PM, NewSouth called the ACAC to report a trouble of "circuit down again." Trouble ticket OC083417 was opened. At 12:32 PM, the ACAC requested a dispatch to the end user's premises. At 1:01 PM, the ACAC opened trouble ticket OC083419 to refer the trouble to the chronic trouble group for resolution. At 12:51 PM, a field technician was dispatched to the remote terminal. At 3:36 PM, the field technician changed the F1 cable pairs, repeater slot, High Gain Line Unit (HLU), smart jack housing and smart jack. This action restored the circuit. The ticket was closed with NewSouth.

On January 10, 2002 at 5:19 PM, NewSouth called the ACAC to report a trouble of "circuit bouncing." Trouble ticket OC083585 was opened. The chronic ticket remained open from January 3, 2002. The PM data did not reveal any errors on circuit. At 5:21 PM, NewSouth requested a vendor meet for January 11, 2002 at 9:00 AM. At 6:46 PM, David at NewSouth called and changed time for the vendor meet to 1:00 PM. At 1:47 PM, the chronic group and BellSouth's technical support group tested the circuit with no trouble found. John at NewSouth agreed to close the ticket and leave chronic ticket open. At 5:35 PM, the vendor found that its equipment was showing trouble erroneously.

On January 15, 2002 at 5:25 PM, the chronic group closed the trouble ticket with NewSouth.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. If you have any additional questions, please call me at 205-321-7730.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000034



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

January 24, 2002

Mr. Mark Pfeiler
Network Operations Director
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Mark:

This is a response to your verbal request of December 18, 2001, for an investigation and a written explanation regarding an interruption of service experienced by NewSouth on circuit 4001/ST01/ATLNGACSK19/ATLNGAHPH08 in the Atlanta, GA Courtland Street Central Office (CO) on December 18, 2001. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On December 18, 2001 at 1:10 PM, NewSouth called the Birmingham Access Customer Advocacy Center (ACAC) to report a trouble of "circuit down." At 1:13 PM, the ACAC technician requested test assistance from the CO. At 1:14 PM, the ACAC requested a first level escalation to the Georgia Work Management Center (WMC). At 1:16 PM, the WMC scheduled this request for the next available technician, however all technicians were already working on other troubles. It is the CO's procedure to work circuits of similar service levels in the order in which they are received. At 2:28 PM, the ACAC technician requested a second level escalation.

At 2:53 PM, Joe Evans with NewSouth called to escalate the trouble to Belinda Newfield, a Supervisor in the ACAC. Belinda called the CO for a status report and was advised that the technician would be working on the trouble shortly. At 3:00 PM, Chris Murphy, a Director in the ACAC called the CO technician who advised that he was working to isolate the trouble. At 3:19 PM, the ACAC called the CO to request a third level escalation.

In attempting to isolate the trouble, the CO technician split the circuit at the Digital Access Cross-Connect System (DACS) and was unable to run to a loop in the multiplexer at the Point of Presence (POP) site. Equipment was switched in the CO multiplexer with no effect. However, when the CO technician attempted to switch the equipment to protect at the POP site, there was no protect equipment. At 3:54 PM, the CO technician requested a dispatch to the POP site to install two cards. One card to replace what was believed to be a defective card and one for the vacant protect slot. At 4:04 PM, the ACAC technician requested a field technician to be dispatched to the POP site.

At 5:08 PM, the field technician arrived at the POP site and equipped the protect slot and changed the working equipment, but this action did not restore the circuit. A DACS jack was also replaced and this action did not restore the circuit. After the field technician changed the equipment, cables and jacks, at 6:59 PM, the ACAC technician requested a CO technician in Courtland Street to work jointly with the ACAC and the field technician. The CO technician changed the equipment, cables, and jacks in the CO ring and the results were the same, the circuit did not restore. At 7:58 PM, the CO technician changed the Synchronous Transport Signal-1 (STS-1) card in the DACS and the Line Build Out (LBO) in the multiplexer. This action restored the circuit. At 8:27 PM, Joe at NewSouth tested the circuit and the ticket was closed with NewSouth.

Based on this information it has been determined that the reason for the outage was a defective STS-1 card in the DACS. The difficulty in isolating the trouble is the primary cause of the extended outage. The CO technician tested the circuit good to a loop into the DACS, but failed to test through the DACS. The CO supervisor has covered the technician of the proper procedures to use to prevent extended outages of this nature in the future.

BellSouth regrets any inconvenience this may have caused NewSouth and it's end users. If you have any questions or need additional information, please feel free to call me at 205-321-4987.

Sincerely,



Rick Alvis
BellSouth Systems Designer



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

November 9, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated October 25, 2001, requesting an investigation and a written explanation of the service interruption experienced by NewSouth's end user, Butler, Means, Evins & Browne, on circuit 30/HCGS/404232/SB. Following are the results of BellSouth's investigation:

On October 23, 2001, at 4:27 PM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC) to report a trouble of "can't loop MUX." Trouble ticket OC081558 was opened. The ACAC tested the circuit and requested a dispatch to the Spartanburg, South Carolina Main Central Office (CO). At 6:30 PM, the CO technician indicated that the Digital Access Cross-Connect System (DACS) K11 was not responding to the testing. At 7:29 PM, BellSouth's Regional Technical Support Group (RTSG) was requested to assist with the DACS trouble. At 10:22 PM, it was discovered that the DACS had an internal software loop on it. A forced command allowed the loop to drop. When NewSouth's technician was informed, he advised that he could still see a loop in the circuit. The ACAC requested another dispatch to the CO. At 11:55 PM, the CO technician discovered that while working on the initial trouble, the CO technician had inadvertently left a loop-back plug in the circuit. When the loop-back plug was removed, service was restored.

On October 24, 2001 at 12:04 AM, NewSouth was notified and the ticket was closed

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. If there are any additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000037



BellSouth Telecommunications, Inc. Fax
Interconnection Services
500 North 19th Street
9th Floor
Birmingham, AL 35203

November 9, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated October 25, 2001, requesting an investigation and written explanation regarding the service interruption experienced by NewSouth's end user, Church Chrysler Plymouth Dodge, on circuit T4/HCGS/710853/SC. Following are the results of BellSouth's investigation:

On October 24, 2001 at 11:38 PM, NewSouth called BellSouth's Access Customer Advocacy Center (ACAC), to report a trouble of "errors to the MUX." Trouble ticket OV046003 was opened. The ACAC tested the circuit but NewSouth advised that a dispatch could not be made to the end user's premises until the next date.

On October 25, 2001, a field technician was dispatched. At 8:53 AM, the technician advised that the margins were not within specification for the cable pair. At 10:47 AM, upon further testing, the technician advised the ACAC that he was seeing a bridge tap on the cable pair. At that time, NewSouth requested that no further activity be performed until after 8:30 PM. The end user had service as long as no repair work was being performed.

At 9:41 PM, the technician repaired the circuit by removing the bridge tap from the cable pair. At 9:42 PM, NewSouth agreed to close the ticket.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. If there are any additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000038



BellSouth Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

CLEC Interconnection Sales

October 15, 2001

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear John:

This is in response to your e-mail of September 28, 2001, requesting an investigation and written explanation regarding the interruption of service experienced by NewSouth's end user, Trident Medical. Following are the results of BellSouth's investigation:

On September 28, 2001 between 11:24 AM and 11:41 AM, NewSouth called BellSouth's Access Customer Advocate Center (ACAC) to report a trouble of "IC sees framing errors" on circuits 36/HCGS/404922/SB, 36/HCGS/404923/SB, 36/HCGS/404997/SB and 36/HCGS/404998/SB. Trouble tickets OC080787, OC080788, OC080797 and OC080798 were opened respectively. The ACAC tested the circuits and requested a dispatch to the Charleston, SC North Central Office (CO). The CO technician advised the ACAC that assistance was needed in the Somerville, SC CO because the OC3 circuit these circuits were riding was taking hits. The ACAC requested a dispatch to the Somerville, SC CO. At 6:35 PM, the technicians had changed out the Low Speed card on the OC3, however this action did not stabilize the circuits. At 10:45 PM, US LEC informed the ACAC that BellSouth needed the concurrence of US LEC prior to further intrusive testing on the OC3. At 11:01 PM, the CO supervisors requested the assistance of BellSouth's Regional Technical Support Group (RTSG) to isolate the trouble and assist in the repair of the circuits. At 11:33 PM, the receiver on the OC48, which the OC3 rides, was changed and the circuit stabilized.

On October 8, 2001, trouble tickets OC080787 and OC080788 were closed with NewSouth. As of October 9, 2001, trouble tickets OC080797 and OC080798 remain open for monitoring purposes.

Regarding your concerns of alleged anti-competitive behavior by a BellSouth technician, BellSouth was unable to locate an interconnection services technician by the name of Tommy, however, further research revealed that BellSouth does have a Customer Provided Equipment (CPE) vendor technician with the name of Tommy. The ACAC has referred NewSouth's concerns to the appropriate BellSouth Business Services manager for handling.

BellSouth regrets any inconvenience this may have caused NewSouth and its end user. If you have any additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000039



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

October 1, 2001

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Re: Trouble ticket OC079870

Dear Mr. Fury:

This is in response to your e-mail dated September 4, 2001, requesting an investigation and explanation of alleged disparaging comments made by Bryant Davis, a Specialist in BellSouth's Network Operations office in Charleston, SC. Following are Bryant Davis' documented comments of his conversation with NewSouth's end user, Mr. Davis of Davis and Small Décor:

On September 4, 2001 at 2:00 PM, Mr. Davis called BellSouth's Network Operations and spoke with Mandy Bryant. Mr. Davis was in the BellSouth lobby demanding immediate help on a trouble ticket. Ms. Bryant realized that she was unable to assist Mr. Davis in answering questions to his satisfaction. Ms. Bryant transferred the call to Bryant Davis in the absence of BellSouth's Network Area Manager.

Bryant Davis identified himself to Mr. Davis. Mr. Davis identified himself as a NewSouth customer and explained that his telephone service had been out for over 4 hours. According to Mr. Davis, NewSouth had advised him that the problem was in BellSouth's network. Mr. Davis demanded that someone go with him to his business to correct the problem. Bryant Davis noted that Mr. Davis had traveled approximately 15 miles from his business on Clements Ferry Road to BellSouth's office in downtown Charleston, SC, to make this request. Bryant Davis advised Mr. Davis that as a NewSouth customer, he should be talking with NewSouth and not talking directly with BellSouth.

During this time, Mandy Bryant pulled the trouble ticket OC079870, which was dropped by the Work Force Administration (WFA) to Network Operations in Charleston, SC, at 1:50 PM. Bryant Davis advised Mr. Davis that the trouble ticket had just been received in the Charleston office and that he would dispatch a technician, but could not provide the exact time. Mr. Davis insisted that someone go with him to his business to repair the service. Again, Bryant Davis explained to Mr. Davis that he should be handling the problem with NewSouth, not BellSouth. This was stated several times during the course of the conversation.

Bryant Davis recalls that during the conversation Mr. Davis requested that he "be a pal and help a guy out." Again, Bryant Davis advised Mr. Davis that he would have a technician dispatched to Mr. Davis' premises. Mr. Davis repeated several times that "there must be something you can do." Bryant Davis explained that BellSouth is obligated to follow procedures when dealing with CLEC customers. That in these instances the CLEC (i.e., NewSouth) was BellSouth's customer, not Mr. Davis. Because Mr. Davis was demanding that BellSouth help him, it was during this time in the conversation that Bryant Davis attempted to explain to Mr. Davis that by dealing with NewSouth, Mr. Davis had introduced a third-party into his service arrangement and that Mr. Davis will need to talk to NewSouth.

NSC/NVX 000040

October 1, 2001
Mr. Fury
Page 2

Apparently Mr. Davis did not fully understand that he should be talking with NewSouth because Mr. Davis' next statement was that he intended to file a complaint with the Federal Communications Commission (FCC) and the Public Service Commission (PSC) against Bryant Davis. Bryant Davis informed Mr. Davis that he should do whatever he deemed in his best interest in this case. Mr. Davis then stated that Bryant Davis was trying to "hide behind procedures." Bryant Davis assured Mr. Davis that BellSouth was not hiding behind procedures, but rather was legally obligated to follow established procedures in cases such as this one. Again, Bryant Davis requested Mr. Davis to call NewSouth for a status report. It was at this point that both parties terminated the call.

On September 4, 2001 at 2:31 PM, an outside technician was dispatched to Mr. Davis' premises. The outside technician replaced a defective High Gain Line Unit (HLU). The trouble was cleared at 5:24 PM.

In closing, according to Bryant Davis, at no time during his conversation with Mr. Davis did he state or even imply that the trouble he was having was the "price you pay" for not having BellSouth as his service provider. To the contrary, Bryant Davis stated several times that BellSouth can not treat his service any differently from any others and that Mr. Davis must deal through NewSouth.

If you have additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000041



BellSouth Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

CLEC Interconnection Sales

September 20, 2001

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
2 N. Main Street
Greenville, SC 29601

Dear John:

This is in response to your e-mail of May 16, 2001, requesting an investigation and written explanation regarding the Georgia Medical Care Foundation's loss of dial tone. I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On May 1, 2001, the BellSouth Local Carrier Service Center (LCSC) received Purchase Order Number (PON) NS14957CS from NewSouth to port Georgia Medical Care Foundation's local telephone service from BellSouth to NewSouth. The desired due date was May 11, 2001. The LCSC issued service orders NOM9K469 and DOQJ9595H with a due date of May 18, 2001.

On Monday, May 14, 2001 at approximately 1:30 PM, NewSouth called BellSouth's account team to report that service for Georgia Medical Care Foundation had been disconnected. The account team referred the trouble to the LCSC and Project Management to isolate the trouble. The LCSC was already aware of the service outage and was working to restore service. The service representative had inadvertently processed the disconnect order before notification was received of a successful port to NewSouth. This action resulted in Georgia Medical Care Foundation's service being prematurely disconnected. At 5:30 PM, the service was restored.

BellSouth regrets any inconvenience this may have caused NewSouth and the Georgia Medical Care Foundation. If you have any additional questions, please call me at 205-321-4987.

Sincerely,

A handwritten signature in cursive script that reads "Rick Alvis".

Rick Alvis
BellSouth Interconnection Sales

NSC/NVX 000042



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

June 8, 2001

Mr. John Fury
Carrier Relations Manager
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail dated April 17, 2001, requesting an investigation and written explanation regarding the service interruption experienced by NewSouth's end user, Focus Golf, on circuit 30/HCGS/404611/SB. Following are the results of BellSouth's investigation:

On April 11, 2001, at 4:33 PM, NewSouth called the BellSouth Access Customer Advocate Center (ACAC) to report a trouble of "circuit is down, can't loop Smartjack." Trouble ticket OC072094 was opened. The ACAC tested the circuit and requested a dispatch to the field. The end user closed at 5:00 PM and there was no access to the premises; therefore, the ticket was placed in delayed maintenance (DM) until the next day.

On April 12, 2001, the field technician tested the loop and the trouble appeared to be in the underground cable. At 10:09 AM, the technician referred the trouble to the cable repair group. The ACAC escalated its request for a cable repair technician. At 6:59 PM, the cable repair technician determined that the cable was clean and the trouble appeared to be on the Digital Loop Carrier (DLC) portion of circuit. The ACAC technician re-tested the circuit and found that the impairment was located between the High Bit Rate Digital Subscriber Line (HDSL) repeater and the multiplexer (MUX). The ACAC requested a dispatch to the field. Two technicians were assigned to work the trouble. At 9:33 PM, the cable pairs were changed but the tests indicated that the trouble was not corrected. At 11:23 PM, NewSouth requested that the technician be dispatched to the end user's premises the next day.

On April 13, 2001, the ACAC was advised that a technician would be at the end user's premises at 9:00 AM. At 10:30 AM, the technician replaced the High Gain Remote Unit (HRU) and changed cable pairs. This action restored the circuit at that time. At 11:55 AM, NewSouth agreed to close the ticket.

If there are any additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000043



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

May 18, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your verbal request of March 14, 2001, for an investigation and written explanation regarding the interruption of service for NewSouth's end user, Ray Price Harley Davidson, on circuit 26/HCGS/412136/SB. Following are the results of the BellSouth investigation:

On February 15, 2001 at 3:20 PM, NewSouth called the Access Customer Advocate Center (ACAC) requesting BellSouth to perform a "Class A inspection", whereby BellSouth verifies all of the connections on a circuit to determine that the connections are correct. At 7:19 PM, the field technician completed the outside portion of the Class A inspection by replacing the High Gain Remote Unit (HRU) as a preventive measure.

On February 16, 2001 at 4:51 PM, the central office (CO) technician completed the CO portion of the Class A inspection. On February 19, 2001 at 5:58 AM, the ACAC called NewSouth to advise the Class A inspection was complete with no visible trouble was found. NewSouth agreed to close the ticket.

On February 19, 2001 at 4:50 PM, NewSouth called the ACAC to request "test assist sometime after 6:00 PM." Trouble ticket OC069061 was opened. At 7:38 PM, NewSouth was notified that the circuit had been tested and the results indicated that no trouble was found. However, NewSouth requested a dispatch for a BellSouth technician to meet with NewSouth's vendor at 7:00 AM on February 20, 2001. The ACAC proceeded with a request for a dispatch to the CO and the field.

On February 20, 2001 at 10:48 AM, the field technician verified the specifications of the circuit and determined that the circuit needed a "doubler" repeater to be added. The distance of the loop to the end user's premises was too long for the circuit to be stable.

On February 22, 2001 at 4:24 PM, the field technician completed the installation of the "doubler" repeater and NewSouth was advised. The ticket was closed on February 25, 2001 at 1:59 PM

On February 26, 2001 at 3:57 PM, NewSouth called the ACAC to request BellSouth to pull the performance monitoring (PM) data on the circuit. Trouble ticket #OC069413 was opened and referred to the CO to pull the PM data.

NSC/NVX 000044

May 18, 2001
Mr. Fury
Page 2

On February 27, 2001 at 9:42 AM, NewSouth called the ACAC to request that the framing be verified on the circuit. The setting on the High-Density Local Unit (HLU) was set incorrectly and it was corrected. The results of the PM indicated some errors on the second span; however, the errors were not significant enough to impact the circuit performance. At 10:42 AM, NewSouth was advised of the findings and agreed to close the trouble ticket at 11:07 AM.

On March 1, 2001 at 2:48 PM, NewSouth called the ACAC to report a trouble of "excessive bit errors." Trouble ticket OC069627 was opened. The ACAC requested a dispatch for a field technician to test the circuit. At 5:14 PM, the field technician determined that the circuit did not have the "doubler" repeater that was to have been installed earlier on trouble ticket OC069061. The ACAC immediately escalated for the work to be performed. At 10:59 PM, the field technician advised that he had completed the temporary rework. The circuit at that time was restored. Once the design of the circuit was updated, the permanent rework would be completed.

On March 2, 2001 at 3:55 PM, NewSouth called the ACAC to request a BellSouth technician meet with NewSouth's vendor on March 5, 2001. Trouble ticket OC069721 was opened for the meeting with the vendor.

On March 5, 2001 at 10:02 AM, the field technician pulled the PM data and it indicated that the circuit was not stable. After the engineer verified the loop loss measurements, it was determined that the "doubler" repeater had been placed in the wrong manhole. The ACAC immediately escalated to repair. At 3:57 PM, the ACAC closed trouble ticket OC069627 because trouble ticket OC069721 would be the ticket to coordinate the rework on the "doubler" repeater. At 8:36 PM, the work on the "doubler" repeater was completed and the circuit restored. The ticket was closed on March 6, 2001 at 9:03 PM.

On March 7, 2001 at 5:03 PM, NewSouth called the ACAC to report a trouble of "circuit was dropping." Trouble ticket OC070008 was opened. The ACAC tested the circuit for the following 3 hours and the circuit tested clean. NewSouth was advised and agreed to closure at 8:58 PM.

On March 30, 2001 at 8:30 AM, NewSouth called the ACAC to report a trouble of "can't loop MUX." Trouble ticket OC0070190 was opened. The ACAC tested the circuit and requested a dispatch to the CO and the field. At 10:47 AM, the ACAC escalated the dispatch request. The CO was testing good to the cable pairs and at 12:07 PM, the trouble appeared to be between the CO and the "doubler" repeater. At 1:14 PM, the problem was isolated to the underground cable feeding the "doubler" repeater from the CO. The cable repair crew advised that the cable had several bad pairs and that they were testing for good cable pairs. The cable pairs were changed and the circuit restored at 8:00 PM. The ticket remained open at the request of NewSouth.

On April 17, 2001 at 5:00 PM, NewSouth called the ACAC with a trouble report of "can't loop smartjack." Trouble ticket OC072478 was opened. The ACAC tested the circuit and requested a dispatch to the CO. The circuit was found to be open on the frame in the CO. The circuit was restored at 6:26 PM. At 6:57 PM, NewSouth advised the ACAC to close the ticket. There have been no further trouble reports on this circuit.

BellSouth regrets any inconvenience this may have caused NewSouth and Ray Price Harley Davidson. If there are any additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian

NSC/NVX 000045



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

May 10, 2001

Mr. John Fury
Carrier Relations Manager
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear John:

This is in response to your e-mail of February 20, 2001, requesting an investigation and written explanation of the interruption of service experienced by NewSouth's end users served out of the New Orleans - Riverside central office (CO). I apologize for the delay in responding to your request. Following are the results of BellSouth's investigation:

On February 15, 2001 at 7:12 PM, NewSouth called the Local Interconnection Service Center (LISC) to report a trouble of "calls falling off the reciprocal trunks" on trunk group ID 1/AF4-TDJKE/NWORLAMA0GT/NWORLAMOCMD in the New Orleans - Riverside CO. Trouble ticket SL000703 was opened.

On February 16, 2001 at 9:38 AM, NewSouth called the LISC for a status of the trouble ticket. The LISC technician advised NewSouth that trouble had been reported on the first trunk of the T1 and no trouble was found. NewSouth requested that the trouble ticket be expanded to include the twenty-two trunks on the T1. During the course of verifying the individual trunks on the T1, the LISC technician also compared the options in the BellSouth switch on the T1 to the options in the engineering Work Order Record and Details (WORD) document and found that the framing/signaling options were incorrect in the BellSouth switch. At 11:55 AM, the LISC technician changed the framing from Super Frame (SF) to Extended Super Frame (ESF). This action cleared the trouble on the reciprocal trunks.

BellSouth regrets any inconvenience this may have caused NewSouth. If there are additional questions, please call me at 205-321-4977.

Sincerely,

A handwritten signature in black ink that reads "Mark Robbins". The signature is written in a cursive, flowing style.

Mark Robbins

NSC/NVX 000046



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

April 20, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Dear Mr. Fury:

This is in response to your e-mail of April 4, 2001, requesting an investigation with a written explanation of the service outages experienced by NewSouth's end user, Betras Plastics, on circuits 30/HCGS/404732/SB and 30/HCGS/404733/SB. Following are the results of the BellSouth investigation:

On March 5, 2001 at 8:08 PM, NewSouth called the BellSouth Access Customer Advocate Center (ACAC) to report a trouble of "can't loop NIU." Trouble tickets OC069865 and OC069866 were opened. The ACAC tested the circuits and requested a dispatch from the Work Management Center (WMC) for both the Spartanburg Central Office (CO) and the field. At 9:28 PM, the technician completed the test through the CO; however, he could not loop the multiplexer (MUX) in the field. The ACAC delayed the field dispatch until the next day. NewSouth was advised and agreed to the delay.

On March 6, 2001 at 9:00 AM, the field technician was dispatched. The technician found that the cable had been cut between poles 17 and 19 outside of the BellSouth CO near a construction site. At 3:50 PM, the trouble was referred to the BellSouth cable repair group. At 6:30 PM, the cable repair was completed and the circuits were restored. NewSouth was notified that the circuits were restored. NewSouth requested that the tickets remain opened until March 9, 2001, at which time they were closed.

BellSouth regrets any inconvenience this may have caused NewSouth and Betras Plastics. If you have additional questions, please call me at 205-321-4913.

Sincerely,

Scott Christian

Scott Christian
Regional Account Manager

NSC/NVX 000047



BellSouth Telecommunications, Inc. Fax
Interconnection Services
600 North 19th Street
9th Floor
Birmingham, AL 35203

April 18, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Re: Misrouted Traffic

Dear Mr. Fury:

This is in response to your e-mail dated April 26, 2001, requesting a clarification of my letter dated March 20, 2001, regarding traffic that was misrouted to MCIWorldCom.

The Access Customer Advocate Center (ACAC) has re-examined Access Service Request (ASR) No. 0032500101 and determined that the technician processing the ASR mistakenly translated the trunk group assignment provided by NewSouth to a WorldCom trunk group assignment, which caused the 1-800 calls for Carrier Identification Code (CIC) 0147 to be misrouted.

With reference to ASR No. 0032500112, this order was cancelled on January 11, 2001, as it pertained to local service, not access service.

BellSouth regrets any inconvenience this may have caused NewSouth. If you have any questions or concerns, please call me at 205-321-4987.

Sincerely,

A handwritten signature in cursive script that reads "Gretchen Temple".

Gretchen Temple

NSC/NVX 000048



BellSouth Interconnection Services
5th Floor
600 North 19th Street
Birmingham, AL 35203

CLEC Interconnection Sales

April 17, 2001

Ms. Debra Hunter
Director of Customer Care
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Debra:

This is in response to your e-mail of March 26, 2001, requesting an investigation with a written explanation of the interruption of service experienced by NewSouth's end user, Buy Gitomer, on circuit 22/HCFU/420930/SB. Following are the results the investigation conducted by BellSouth:

On February 12, 2001 at 11:34 AM, NewSouth called the BellSouth Customer Wholesale Interconnection Network Services (CWINS) to report a trouble "can't loop NIU/LCON." Trouble ticket CI-034806 was opened. The CWINS tested the circuit and was unable to latch the High Gain Remote Unite (HRU). At 12:02 PM, the CWINS requested an outside technician to be dispatched. At 1:02 PM, the CWINS issued a first level escalation with the Work Management Center (WMC) to have a technician dispatched. At 3:05 PM, the CWINS issued a second and third level escalation to the WMC. At 6:18 PM, the CWINS issued a fourth level escalation to set up a dispatch for the next day. At 7:31 PM, NewSouth requested an evening dispatch. At 7:41 PM, CWINS escalated to the duty supervisor for an evening dispatch. At 9:36 PM, the outside technician informed CWINS that he had replaced a missing jumper in the cross-box. The CWINS called NewSouth to turn up the circuit but did not get an answer. The CWINS then tested the circuit with the outside technician and was able to run clean to the Customer Service Unit (CSU). At 10:31 PM, NewSouth was notified of the repair. NewSouth requested that the ticket be placed in a Delayed Maintenance (DM) status for 24 hours.

On February 13, 2001 at 1:26 PM, NewSouth called the CWINS to report that the circuit was bouncing and requested a test assist from the BellSouth Central Office (CO) to work with a NewSouth technician. At 1:33 PM, the CWINS requested the CO to perform a Class-A inspection as well as a test assist. At 2:42 PM, the CWINS made a third level escalation for the Class-A inspection and co-op testing. At 3:02 PM, NewSouth advised that the circuit was up and running and the end user did not wish to take the circuit down for testing. At this time, CWINS advised the outside technician to perform the Class-A inspection without any testing so as not to take the circuit down. At 7:40 PM, the outside technician advised that he was unable to contact the end-user to request permission to take the circuit down for testing. The CWINS tested to the smartjack and ran a simulated test for 15 minutes, finding no errors. At 8:01 PM, the outside technician advised that he found no trouble through the Class-A inspection. The CWINS called NewSouth but received no answer. The CWINS placed the ticket in DM status pending contact with NewSouth.

NSC/NVX 000049

April 17, 2001
Ms. Hunter
Page 2

On February 14, 2001 at 8:05 AM, the CWINS called NewSouth to advise that no trouble had been found. NewSouth requested DM for 24 hours. At 11:22 AM, NewSouth called the CWINS and reported that the circuit was still bouncing. At 11:24 AM, the CWINS requested that the CO perform another Class-A inspection and testing. At 1:02 PM, the CWINS escalated to first level for the outside technician dispatch. CWINS also checked the previous day's data, which showed errors coming from the end user's direction. At 2:29 PM, CWINS issued a second level escalation to the WMC. At 3:41 PM, NewSouth informed CWINS that the circuit could be taken down after 6:00 PM. At 3:52 PM, the outside technician pulled the data and noted that the margins and pulse attenuation were both good but he was seeing errors. At 8:10 PM, the outside technician began working with the NewSouth technician at the end user's premises.

At 8:12 PM, the outside technician reported that the NewSouth technician had changed out some of the end user's equipment and the circuit had not been down since that time. However, as a precaution, the outside technician changed out the HRU, aerial pair and verified all wiring to the end user's suite. At 9:28 PM, the outside technician reported that he never found a trouble on the circuit but replaced the circuit equipment at NewSouth's request. The CWINS placed the ticket in DM status until NewSouth could be contacted.

On February 15, 2001 at 8:03 AM, CWINS called and informed NewSouth of the repairs. NewSouth requested that the ticket be held in DM status for 24 hours.

On February 16, 2001 at 8:09 AM, the ticket was closed.

If there are additional questions, please call me at 205-321-4913.

Sincerely,



Mark Robbins

NSC/NVX 000050



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

April 12, 2001

Ms. Alisa Downs
Manager
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Alisa.

This is in response to your e-mail of January 15, 2001, requesting an investigation with a written explanation of the early disconnect of service experienced by NewSouth's end user, Homewood Suites. I apologize for the delay in responding to your request. The following are the results of BellSouth's investigation:

On October 31, 2000, the Local Carrier Service Center (LCSC) Complex Group received Purchase Order Numbers (PONs) NS9250KY, NS9251KY, NS9252KY, NS9253KY and NS9254KY from NewSouth for a total migration of service for Homewood Suites from BellSouth to NewSouth. The desired due date was October 30, 2000.

On November 1, 2000, the LCSC issued services orders and sent a Firm Order Confirmation (FOC) to NewSouth with a due date of November 7, 2000. The Subscription Verifications (SVs) were submitted to the Number Portability Administration Center (NPAC). The trigger orders and the disconnect orders were issued at this time. The disconnect orders had a December 29, 2000 due date, which is according to procedure.

On November 7, 2000, NewSouth was unable to cut the customer to its switch and advised it would reschedule a new date.

On December 7, 2000, NPAC canceled the SVs, however the LCSC did not receive a subsequent order from NewSouth to either change the due dates or cancel the orders.

Therefore, on January 2, 2001, the disconnect orders for Homewood Suites were completed by BellSouth's mechanized systems and the service was interrupted on January 5, 2001.

On January 5, 2001, NewSouth notified the LCSC that the end user had lost service. After investigating the report, the LCSC determined the disconnect orders had been completed and the records had been purged from BellSouth's systems. The LCSC escalated the issue and the service was re-provisioned on January 6, 2001. The LCSC notified NewSouth the service was working at 6 00 PM.

If there are additional questions, please call me at 205-321-4913.

Sincerely,

A handwritten signature in black ink that reads 'Mark Robbins'.

Mark Robbins

NSC/NVX 000051



E-mail from NewSouth to BellSouth dated January 15, 2001

From: adowns@newsouth.com
To: Robbins, Mark
Cc: jfury@newsouth.com; adowns@newsouth.com
Subject: FW: Bell disconnects

Mark

Please provide Root Cause Analysis for the following customer. Homewood Suites- Greensboro, NC PON NS9250KY, NS9251KY, NS9252KY, NS9253KY, NS92554KY. This customer was originally scheduled to cutover on 11/15/00. We were unable to cut customer at this time and had no rescheduled date. The orders had been cancelled in NPAC. On 1/5/01 the customer's main number went down.

NSC did not request Bell to disconnect this customer service on Jan. 4. However, when the customer called BellSouth they were led to believe that this disconnect order was placed by NewSouth and they would need to contact NewSouth to repair service.

Initially on Friday only the customer BTN (336.393 0088) was affected. Late Friday afternoon the BTN was RCF'd and problem temporarily 'patched'.

Friday at 8 PM customer's service was entirely disconnected. During Saturday NSC Sales/Customer Care/OC worked with BellSouth employee's Chris Houston/Elaine Hunt/Bill Thrasher to get customer's service restored which occurred at 7 PM Saturday night.

Mark, let me know if more info is needed. Thanks.

Alisa

ERT#62/03280102 DOC

NSC/NVX 000052



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

March 20, 2001

Mr. John Fury
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Re: Misrouted Traffic

Dear Mr. Fury:

This is in response to your email dated January 22, 2001, requesting an investigation and a written explanation of the NewSouth traffic that was misrouted to WorldCom. Following are the results of BellSouth's investigation.

On January 12, 2001, BellSouth's Access Customer Advocate Center (ACAC) contacted the Network Infrastructure Support Center's (NISC's) Complex Translations Group (CTG) and requested that Access Service Request (ASR) No. 0032500100 and associated ASR No. 0032500101 be processed to reroute calls for Carrier Identification Code (CIC) 0147 in the New Orleans Metairie, Louisiana tandem. During the ensuing telephone conversation, the CTG technician and the ACAC technician determined from the ASR that NewSouth was requesting to point first-choice traffic to trunk group AF146544 and overflow to trunk group AF152038. Because the information on the ASR was not clear and NewSouth had furnished an incorrect trunk group, this resulted in 1-800 calls for CIC 0147 to be inadvertently routed to WorldCom's trunk group AF146544.

On January 18, 2001 at 7:51 AM, NewSouth called the ACAC to report the misrouted traffic. Trouble ticket ZM036904 was open. During the trouble isolation process, a conference call between the ACAC technician, NISC technician and NewSouth determined that first-choice traffic should route to trunk group AF157834 with an overflow to trunk group AF152038. These translations were corrected and the trouble ticket was closed on January 18, 2001 at 10:45 AM.

Both the NISC CTG technician and the ACAC technician have been covered on the ASR being the official ordering document and no translation work should take place without a complete and accurate ASR. The ASR should have been returned to NewSouth for clarification.

BellSouth regrets any inconvenience this may have caused NewSouth. If you have any questions or concerns, please call me at 205-321-4987.

Sincerely,

A handwritten signature in black ink that reads "Gretchen A. Temple".

Gretchen Temple

NSC/NVX 000053



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

February 12, 2001

Mr. Mark Pfeiler
NOC Director
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Mark:

This is in response to your e-mail of January 29, 2001, requesting an investigation and a written explanation regarding the interruption of service for NewSouth's end user, Holden & Company, on circuit 40/HCGS/603352/SB. Following are the results of BellSouth's investigation:

On January 25, 2001 at 4:49 PM, EST, NewSouth called the Access Customer Advocate Center (ACAC) to report a trouble of "IC can't loop smartjack." Trouble ticket OG079093 was opened. The ACAC tested the circuit and requested a dispatch from the Work Management Center (WMC). At 5:39 PM, the WMC advised that a dispatch would be made the next day because the Central Office (CO) closed at 5:00 PM. The ACAC reiterated the need for a dispatch that evening and at 7:00 PM, requested a first level escalation. At 8:43 PM, a second level escalation was requested. The WMC initiated a call-out for a technician and an estimated time of arrival for the technician was set for 9:45 PM. At 10:35 PM, the CO technician replaced a jumper on the frame and the circuit was restored. At 10:40 PM, NewSouth was notified and the ticket was closed.

If there are additional questions, please call me at 205-321-4913.

Sincerely,

A handwritten signature in cursive script that reads "Mark Robbins".

Mark Robbins

Written request to WMC to address this problem.

More Appropriate: Letter to Keith Andrews, Bob Fischer

NSC/NVX 000054



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

January 31, 2001

Mr. Chris Connolly
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Chris:

This is in response to your e-mail of December 13, 2000, requesting an investigation and written explanation regarding the interruption of service for NewSouth's end user, Pizza Hut, on telephone numbers, 225-925-2121 and 225-262-0200. Following are the results of BellSouth's investigation:

PON 27553:

On November 28, 2000, the Local Carrier Service Center (LCSC) received Purchase Order Number (PON) 27553 from NewSouth to convert telephone number 225-262-0200 from resale to Unbundled Network Element Platform (UNE-P). The desired due date was December 5, 2000. The LCSC issued service orders N52XRL87 and D52WP3L1 with a due date of December 5, 2000.

It appears that sometime during the process, the due date for the N52XR187 was changed from December 5, 2000 to December 11, 2000. When changing the due date for the N52XR187 service order, the LCSC service representative failed to change the due date for the D52WP3L1, and as a result, telephone number 225-262-0200 was disconnected on December 9, 2000. Service was restored on December 11, 2000. There is no documentation in BellSouth's LCSC as to who reported the interruption or to support the time of day service was restored.

On December 11, 2000, the service orders were completed to change the service from resale to UNE-P.

PON 27556:

On November 29, 2000, the LCSC received PON 27556 from NewSouth to convert telephone number 225-925-2121 from resale to UNE-P. The desired due date was December 4, 2000. The LCSC issued service orders N5886GK8 and D582T7F1 with a due date of December 4, 2000.

It appears that sometime during the process the due date was changed on the N5886GK8 service order from December 4, 2000 to December 9, 2000 and again to December 11, 2000. When changing the due date for the N5886GK8 service order, the LCSC service representative failed to change the due date for the D582T7F1, and as a

NSC/NVX 000055

result telephone number 225-925-2121 was disconnected on December 9, 2000. Service was restored on December 11, 2000. There is no documentation in BellSouth's LCSC as to who reported the interruption or to support the time of day service was restored.

On December 11, 2000, the service orders were completed to change the service from resale to UNE-P.

The situations outlined above have been discussed with the service representatives and additional training was given to prevent situations such as this one from occurring in the future.

I apologize for the delay in responding to your request. If there are additional questions, please call me at 205-321-4913.

Sincerely,



Mark Robbins



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

January 11, 2001

Mr. Matt Rissman
Manager of Carrier Relations
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Matt:

This is in response to your e-mail of November 21, 2000, requesting a summary of the issues and the resolutions to those issues associated with the project turn-up in Louisville, KY. I have listed the NewSouth issues as well as a BellSouth response.

NewSouth Issue: Super Group traffic sent over BellSouth's one-way outbound local group.

BellSouth Response: During the provisioning of the NewSouth's trunk groups in Louisville, various translation documents were issued to adjust the different levels of build out of NewSouth's trunk groups and handle code memorandum changes. Also during this time period, two of the translation documents were issued with an error and transit traffic was routed to the reciprocal trunk group. Once the problem was identified, a new translation document was issued to correct the error, and transit traffic was routed to NewSouth's two-way transit trunk.

NewSouth Issue: CLEC to CLEC traffic.

BellSouth Response: The translations in the Armory Place tandem were built according to the old standards for CLEC to CLEC traffic. The technician responsible for building these translations was not aware of the new guidelines that authorized CLEC to CLEC traffic at the local tandem. The correction was made once the problem was identified.

NewSouth Issue: NXXs not open in all end offices.

BellSouth Response: The Network Infrastructure Support Center (NISC) missed the due date for one NXX in two of the nineteen (19) Louisville central offices. From October 23 to October 27, 2000, calls to this one NXX were blocked in these two central offices.

While there were minimal translation problems in Louisville, the primary reason calls were blocked was because of the limited number of trunks in this particular trunk group. It appears that the initial forecast from NewSouth was for BellSouth to provide 120 reciprocal trunks. BellSouth issued an order for 120 trunks. However, on July 21, 2000, NewSouth reduced the quantity of trunks from 120 to 24 trunks. The reason given by NewSouth for this reduction was due to NewSouth's switch and facility resources. In early October, NewSouth added a new customer, which caused the 24 trunks in the group to become blocked with the additional traffic. There was no prior notification to BellSouth regarding an increase in traffic. NewSouth reported the blocking to BellSouth on October 18, 2000. At this time the problem with the translations was identified and corrected. At the request of NewSouth, BellSouth issued an order to add 48 additional trunks to the reciprocal trunk group. The order was completed on October 25, 2000.

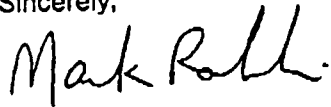
NSC/NVX 000057

January 11, 2001
Mr. Rissman
Page 2

It is not appropriate for BellSouth to make joint site visits. The issues identified above have been addressed with each individual involved to avoid similar situations in the future.

Please feel free to call me at 205-321-4913, if there are additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Robbins". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mark Robbins
Account Manager



BellSouth Interconnection Services
9th Floor
600 North 19th Street
Birmingham, Alabama 35203

CLEC Interconnection Sales

December 28, 2000

Mr. Matt Rissman
Manager of Carrier Relations
Legal and Regulatory Department
NewSouth Communications
Two North Main Street
Greenville, SC 29601

Re: Performance Measurement Analysis Platform (PMAP) metrics

Dear Mr. Rissman:

This is in response to your letter dated December 18, 2000, requesting PMAP metrics for every month in the year 2000.

BellSouth does not have the resources to provide historical data to NewSouth for the purpose of updating performance records. When PMAP was introduced in April 1999, BellSouth invited all CLECs to a PMAP training course to learn about the reports and how to pull their own data. Four employees of NewSouth attended the training class. BellSouth indicated, during the training, that it would be the responsibility of the CLEC to pull its own data from the PMAP Web site each month. Additionally, it was explained that the data is replaced every thirty (30) days with the successive month's report. NewSouth has had an active PMAP user ID and Password since mid-1999 and has had the training necessary to download the reports each month. Also, for NewSouth's convenience there is detailed documentation on the Web site to assist new employees with the performance report download process.

If you have questions, please call me at 205-321-4987.

Sincerely,

A handwritten signature in cursive script that reads "Gretchen A. Temple".

Gretchen Temple

NSC/NVX 000059



CLEC Interconnection Sales

BellSouth Interconnection Services
9th Floor
800 North 19th Street
Birmingham, Alabama 35203

December 21, 2000

Mr. Mark Pfeiler
NOC Director
NewSouth Communications
Two N. Main Street
Greenville, SC 29601

Dear Mark:

This is in response to your e-mail of November 28, 2000, requesting an investigation with a written explanation of a service issue involving telephone calls from 904-260-8001 to 904-548-0499 for a NewSouth end user. Following are the results of BellSouth's investigation:

On November 27, 2000 at 11:42 AM, NewSouth called the Customer Wholesale Interconnection Network Services (CWINS) to report that NewSouth's Local Number Portability (LNP) telephone number 904-260-8001 was receiving an announcement that the call could not be completed as dialed when its end user called telephone number 904-548-0499. NewSouth further explained that it was sending this call with ten digits over trunk group AC460093 to the BellSouth Jacksonville - Clay Street (JCVLFLCL55T) central office. The CWINS center opened trouble ticket VI012289.

At 12:14 PM, the CWINS simulated a call that failed to complete. The trouble was then referred to the Network Infrastructure Service Center (NISC) to isolate the trouble. At 3:00 PM, the NISC advised the CWINS that NewSouth was sending this type call over an incorrect trunk group. This call should be routed over trunk group AC460085 to the Jacksonville - Clay Street (JCVLFLCLDS1) central office. The NISC also advised that NewSouth should be sending seven digit telephone numbers rather than ten digits. NewSouth was advised of the findings and requested that the ticket be placed into delayed maintenance.

At 3:50 PM, NewSouth advised the CWINS that NewSouth did not have AC460085 as a working trunk group and that NewSouth had been sending ten digit calls over trunk group AC460093 since the office was cut. The CWINS referred this issue to the NISC for resolution. At 4:44 PM, NewSouth contacted the CWINS to advise that the calls were no longer being blocked.

The NISC had determined that the NPA/NXX of 904/548 had not been input in the translation tables to allow traffic from any CLEC. Once the NISC corrected the translations, calls completed successfully and the trouble ticket was closed.

NSC/NVX 000060

06/10/04 THU 14:44 FAX 8646725040

NewSouth Communications

December 21, 2000

Mr. Pfeller

Page 2

I have attached for your convenience a copy of the most current BellSouth CWINS Contact and Escalation Guide. CWINS personnel will handle escalations involving the NISC.

If there are additional question, please call me at 205-321-4913.

Sincerely,

Quichen O. Sample

for Mark Robbins

Attachment

NSC/NVX 000061

BellSouth CWINS Contact and Escalation Guide

Customer Wholesale Interconnection Network Services (CWINS) - Birmingham

Provisioning & Maintenance for Unbundled Loops and number portability.

Escalation Procedure -

1st Level - Escalate to a technician at one of the numbers below.

2nd Level - Escalate to the appropriate provisioning or maintenance manager.

3rd Level - Escalate to the Center Support Manager or Operations Director.

* Urgent messages will automatically page all employees during normal business hours.

* After Hours/Weekends - Escalate through a technician in the maintenance group.

Main numbers:

Eastern Region States:	(NC, SC, GA, FL)	780-6144
Western Region States:	(MS, LA, KY, TN, AL)	557-6144
Local:		(205) 714-0141
Toll Free:		(800) 811-9079

Name	Title	Office
Jim Argo	Operations Assistant VP	404-541-4019
Maintenance	GA, TN, LA, MS	
Steve Spitzer	Operations Director	205-714-0072
David L. Jones	Center Support Manager	205-714-0073
Clay Cook	Maintenance Manager (GA)	205-714-0482
Grant Collom	Maintenance Manager (GA)	205-714-0334
Bessie White	Maintenance Manager (GA)	205-714-0224
Mike Hyre	Maintenance Manager (TN,LA,MS)	205-714-0447
David A. Jones	Maintenance Manager (TN,LA,MS)	205-714-0273
Bud Hathcox	Maintenance Manager (Load Balance)	205-714-0446
John Griffin	Maintenance Manager (3PM -12M CDT)	205-714-0049
Maintenance	FL, NC, SC, AL, KY	
Vacant*	Operations Director	205-714-0045
Vacant*	Center Support Manager	205-714-0053
Joe Rejonis	Maintenance Manager (FL)	205-714-0496
Robert Richey	Maintenance Manager (FL)	205-714-0483
Steve Townsend	Maintenance Manager (NC,SC)	205-714-0131
vacant	Maintenance Manager (NC,SC)	205-714-0249
Eric Johnson	Maintenance Manager (AL,KY)	205-714-0495
Kevin Green	Maintenance Manager (Load Balance)	205-714-0251
David Patterson	Maintenance Manager (3PM -12M CDT)	205-714-0126

NSC/NVX 000062

Revised 12/01/00
C:\TEMP\12120007.DOC
Owner: Steve Spitzer

December 13, 2001

Mr. Wayne Wnght
Director-Engineerng
Alabama Public Service Commission
P O Box 304260
Montgomery, AL 36130

Re: NewSouth Communications Corporation Letter, Dated November 1, 2001

Dear Mr. Wright:

On November 1, 2001, NewSouth Communications Corporation ("NewSouth") sent a letter to Mr. Walter L. Thomas, Secretary of the Alabama Public Service Commission ("Commission"), regarding service interruptions that NewSouth customers experienced in Mobile from September 19, 2001 through September 26, 2001. On November 16, 2001, Mr. Darrell Baker, Director of the Commission's Telecommunications Division, requested an investigation and report from you and other Commission Staff members regarding the service interruptions. As a result of your request for BellSouth's input on items outlined in Mr. Baker's request, BellSouth has investigated the concerns expressed by NewSouth in its letter to the Commission. BellSouth's findings are detailed below. These findings are in response to the first six items of Mr. Baker's request to the Staff.

1. ***Complete description in chronological order, of the events that occurred leading up to, during and subsequent to the incident to include personnel involved, actions taken and details of correspondence between both companies.***
3. ***Explanations from both companies as to the causes for the service problems plus a Telecommunications Division staff analysis of same.***

[To avoid duplication in its responses, BellSouth is responding to Items 1 and 3 in Mr. Baker's request at the same time.]

Eight trouble tickets were received from NewSouth during the period September 19 through September 26, 2001

Trouble Ticket No. 1

Ticket ID: NL002134

Received by BellSouth: September 19, 2001 at 1:37 PM and referred to the Network Infrastructure Support Center ("NISC").

Description of Trouble. BellSouth telephone number (251) 452-7171 cannot connect with NewSouth telephone number (251) 457-5347.

Disposition: The NISC closed as "no trouble found."

BellSouth's Actions/Work Activities. Translations in BellSouth's Mobile Azalea central office were verified as correct. NPA/NXX code (251) 457 was open and appropriately routed to NewSouth in the Azalea office.

Trouble Ticket No. 2

Ticket ID: NL002139

Received by BellSouth. September 20, 2001 at 9:25 AM and referred to the NISC.

Description of Trouble NewSouth telephone number (251) 457-6872 cannot connect with BellSouth telephone number (251) 438-3532.

Disposition The NISC closed as "no trouble found."

BellSouth's Actions/Work Activities: The translations in BellSouth's Mobile Azalea central office had been verified as correct. NPA/NXX code (251) 457 was open and routed to NewSouth in the Azalea office. In the process of investigating the trouble report, however, a NISC specialist, Thad Norris, and technician Jeanie Lindsey, looked up the current Translations Work Instructions ("TWINS") document to verify that the routing of BellSouth's traffic to NewSouth was correct. It was discovered that BellSouth was incorrectly routing BellSouth's traffic to NewSouth over a transient trunk group. According to TWINS, BellSouth's traffic to NewSouth should have been routed over a reciprocal trunk group. Mr. Norris instructed Ms. Lindsey to correct the routing and send BellSouth's traffic over reciprocal trunk group AF410438 and to send interexchange carrier ("IXC"), wireless, and other competitive local exchange carrier ("CLEC") traffic to NewSouth over the transient trunk group.¹ This correction, and an error made during the error correction activities, unfortunately lead to later problems.

¹ BellSouth-to-NewSouth traffic should be routed over reciprocal trunk groups. All other traffic involving NewSouth should be routed over transient trunk groups. Prior to BellSouth's correction, BellSouth-to-NewSouth local and intraLATA traffic was routing over a transient trunk group with access to 120 trunks and an overflow trunk group with access to 72 trunks. Following the correction, the traffic was routing over a reciprocal trunk group with access to 72 trunks.

Trouble Ticket No. 3

Ticket ID NL002202

Received by BellSouth: September 21, 2001 at 11:55 AM and referred to the NISC

Description of Trouble BellSouth telephone number (251) 460-8100 cannot call NewSouth telephone number (251) 457-2695.

Disposition: The NISC closed as "no trouble found."

BellSouth's Actions/Work Activities: As a result of recurring trouble reports from NewSouth, NISC Area Manager, Janice Stallworth, was advised of the troubles. Conference calls were initiated with NewSouth employees Cathy Kirkland, Kevin Camp, and others to identify the problem. NISC specialist Thad Norris, technician Jeanie Lindsey, network manager Colin Owens, and several other BellSouth technicians joined the conference calls to identify and resolve the problem

Trouble Ticket No. 4

Ticket ID NL002203

Received by BellSouth: September 21, 2001 at 12:10 PM and referred to the NISC.

Description of Trouble BellSouth telephone number (251) 625-3050 cannot call NewSouth telephone number (251) 457-6872.

Disposition: The NISC closed as "no trouble found"

BellSouth's Actions/Work Activities: Discussions occurred between a NISC technician Aycock and NewSouth's Kevin Camp

Trouble Ticket No. 5

Ticket ID NL002205

Received by BellSouth: September 21, 2001 at 12:39 PM and referred to the NISC.

Description of Trouble: NewSouth customers were receiving fast busy signals and failures of attempted long distance calls. NewSouth requested verification that transient trunk group AF410353 was sending 10 digits

Disposition: The NISC closed as "no trouble found."

BellSouth's Actions/Work Activities: Additional discussions were held between BellSouth personnel and NewSouth personnel

During discussions between BellSouth personnel and NewSouth personnel on the evening of September 21,

2001, (BellSouth NISC technician Childress and NewSouth employee Camp), Mr. Camp acknowledged that NewSouth had failed to open NPA/NXX (251) 457 in the NewSouth 5ESS switch and that NewSouth had corrected that problem. Mr. Camp then mentioned to Mr. Childress that 1+ calls to NewSouth were not completing. Mr. Childress performed a translations verification test and found that 13 digits were being sent on the trunk group to NewSouth rather than 10 digits (performed a TRAVER from an IXC dialing the Local Number Portability Location Routing Number [LNP LRN] for calls directed to NewSouth via NPA 251 or 334 plus 544-9995). Mr. Childress deleted three digits, performed another translations verification, and made additional test calls. Following the deletion of three digits, 1+ calls were being completed. This error (13 digits vs. 10 digits) evidently was introduced when BellSouth corrected the trunk group routing discussed in Trouble Ticket No. 2 above.

Trouble Ticket No. 6

Ticket ID: NL002208

Received by BellSouth: September 24, 2001 at 10:47 AM and referred to the NISC.

Description of Trouble: BellSouth telephone number (334) 653-5353 cannot call NewSouth telephone number (334) 633-3321. Receiving fast busy.

Disposition: This trouble report was sent to technician Johnson in BellSouth's Theodore 5ESS central office. Mr. Johnson consulted with the Azalea technician and the NISC team regarding the problem. Translations in the BellSouth Azalea central office were changed on a class of service screening table to prefix 251 rather than 334 and test calls were completed successfully.

BellSouth's Actions/Work Activities: See disposition discussion above. NewSouth, however, later advised BellSouth that the trouble still existed. Both NewSouth and BellSouth personnel agreed that the translations made in the Azalea central office should be reversed so BellSouth returned the prefix to 334.

As a result of continuing trouble tickets from NewSouth, it is possible that BellSouth made translations changes, which appeared to solve one trouble report, only to find that the translations changes may have caused other problems. This was the case on this trouble ticket.

The problems identified with Trouble Ticket Nos. 5 and 6 were resolved on September 25, 2001, after the Complex Translations Group ("CTG") changed translations to send the exact digits received at the tandem to NewSouth on

the reciprocal trunk group without any deletion or prefixing of digits.

Trouble Ticket No. 7

Ticket ID NL002214

Received by BellSouth: September 25, 2001 at 11:00 AM and referred to the NISC.

Description of Trouble: BellSouth telephone number (251) 330-3319 cannot call NewSouth telephone number (251) 57-6872.

Disposition: The NISC closed as "no trouble found" following test calls.

BellSouth's Actions/Work Activities: The problem was isolated to the NewSouth customer's local office telephone system.

Trouble Ticket No. 8

Ticket ID: NL002217

Received by BellSouth: September 26, 2001 at 8:20 AM and referred to the NISC.

Description of Trouble: BellSouth telephone number (251) 330-3319 cannot call NewSouth telephone number (251) 457-6872.

Disposition: Duplicate trouble report - same trouble as Trouble Ticket No. 7.

BellSouth Actions/Work Activities: See Trouble Ticket No. 7.

2. *Impact on service to NewSouth (customer identities and number of lines affected by date) and a description of the service problems experienced.*

In addition to the various translations problems, when BellSouth customers in the Mobile area tried to call several customers, they received reorder (fast busy) if they called at a time when all 72 trunks in the reciprocal trunk group were busy (from September 20, 2001, through mid day on September 26, 2001, usually between 4:00 and 5:00 PM. This situation occurred after the change from routing over the transient trunk group to routing over a reciprocal trunk group (See Trouble Report No. 2 above).

As indicated in the discussion of Trouble Ticket No. 2, BellSouth corrected an error in the routing of traffic from BellSouth customers who were calling NewSouth customers. After correcting, the traffic load on the reciprocal trunk group exceeded capacity, at times, and resulted in an all trunks busy situation. On September 25, 2001, a NISC Area Manager Ms Stallworth asked NewSouth employee Kirkland if NewSouth had contacted NewSouth trunk capacity personnel regarding trunk capacity problems. Ms Kirkland responded that NewSouth did not have any capacity problems.

On September 26, 2001, a BellSouth CTG technician saw an all trunks busy situation on the reciprocal trunk group with NewSouth and reported it. BellSouth personnel again discussed the situation with Ms. Kirkland and suggested implementation of a temporary fix (overflowing the reciprocal trunk group to the transient trunk group). Ms. Kirkland agreed, and BellSouth personnel implemented the necessary translations to reciprocal trunk group AF410438. Following the temporary fix, trunk blockages ceased. BellSouth had requested additional reciprocal trunk group capacity on September 21, 2001. NewSouth processed BellSouth's request and additional capacity was provided on October 3, 2001.

3. *Explanations from both companies as to the causes for the service problems plus a Telecommunications Division staff analysis of same.*

See discussions above.

Beginning on September 24, 2001, and continuing through September 26, 2001, BellSouth established a team that worked relentlessly with NewSouth on several conference calls per day to attempt to quickly resolve the problems. BellSouth technicians, network managers, specialists, an area manager, Regional Technical Support personnel, and NISC CTG staff personnel comprised the BellSouth team and were all involved on conference calls with NewSouth personnel Cathy Kirkland, Kevin Camp, and others. NewSouth personnel faxed a list of specific calls that failed to BellSouth personnel and the NISC CTG investigated each one in great detail. As evidenced in the discussions above, each company contributed to the problems.

4. *Recommendations from BellSouth and NewSouth on how to prevent such problems on a going forward basis to include an implementation plan if applicable.*

The following measures have been or are being implemented by BellSouth to ensure more accurate, timely CLEC LNP trouble isolation and resolution.

- A Trouble Shooting Job Aid has been implemented that requires verification of trunk group utilization with Circuit Capacity Management ("CCM") and notification to the Single Point of Contact ("SPOC") and CLEC project manager before making any translations changes to CLEC routing. The CLEC Project Manager will notify the CLEC before any change is made. The job aid was implemented on October 2, 2001 and covered with all CTG technicians by their network manager
- Several documents that detail CLEC LNP Provisioning in DMS 100/200/500 tandems have been reviewed with appropriate personnel.
- LNP training for all technicians is planned for early 2002. Some technicians will be sent to formal Telecordia LNP training.
- During 1st Quarter 2002, the BellSouth NISC/LISC staff organization will implement a plan to verify translations for all CLECs and make corrections if necessary

6. Recommendations from BellSouth and NewSouth on possible BellSouth remedy for NewSouth and its customers who were affected by the outages of September 19-26, 2000.

BellSouth regrets any inconvenience that NewSouth or its customers may have experienced as a result of the issues discussed in this letter. Provisioning of telephone service, however, is a very complex process and, unfortunately, both CLEC personnel and BellSouth personnel sometimes make human errors. BellSouth's proposed preventative measures outlined in Item No. 5 above should reduce future situations of this kind. Please be assured that BellSouth is committed to providing NewSouth and its customers with the best possible service. Because both parties contributed to the service problems, it is BellSouth's position that NewSouth's request for further "remedy" is totally inappropriate.

Finally, although not part of Mr. Baker's request to the Staff, BellSouth must respond to some of the statements made by NewSouth in its November 1, 2001 letter.

NewSouth states that the "main cause of the outage resulted from improper routing/translations by BellSouth". Information above indicates there were translation problems in both BellSouth and NewSouth switches. In fact, the first four trouble tickets discussed above were the result of a NewSouth translation problem.

NewSouth states that "translations work being done in various central offices in the LATA is related to the NPA Split currently underway". While NPA split translation work has been necessary in affected central offices, this work did not contribute to the problems encountered during this time period. Translation work cited under "Trouble Ticket Number Two", above, addresses the issue.

NewSouth states that "this trunk should have had overflow routing set up in the event of high volume". It is not BellSouth's policy to overflow from reciprocal to transient trunks groups.

I trust this information answers your questions and concerns. If we can be of further assistance in this matter, please let us know.

Sincerely,



Tony Hendrix
Manager-Alabama Regulatory

ROOT CAUSE ANALYSIS (RCA) REQUEST

Date Of Request 07/07/00

BellSouth Telephone Numbers or Circuit ID(s)

PON SC3CM006500002

Order Number(s) CX559978

Due 05/30/00

Date(s) 05/30/00

Customer Name (End User) FAUCETTE LAW FIRM

TYPE OF REQUEST Number Portability X Resale UNE X Repair issue

Repair TKT #

Other (specify)

CLEC Contact Name KMC TELECOM

Contact Number 864 253 9009

Detailed Description Of Issue PLEASE SEE KMC TELECOM's SEQUENCE OF EVENTS ATTACHED

To be completed by CSM:

CSM

Accepted Denied

If accepted the RCA will be forwarded to the Account Team within 5 business days

KMC00001

<u>Date/Time</u>	<u>Event</u>	<u>Problem w/Solution</u>	<u>Comments (include org. at fault)</u>
5/17/00	sent down USOF to SPC to be provisioned	N/A	N/A
5/17-5/25	Recv'd all confirmations back from SPC	N/A	N/A
5/30/0 @ 9 am	Customer call'd in on cell phone and stated that they had no dial tone.	No Dial Tone @ Cust. Prem.	N/A
5/30/00 @ 9:15 am	Call'd Bell UNE and spoke to tech (Willy @) ext. 5254	he will call CO and check status	CO techs. May have prematurely performed cut.
5/30/00 @ 9:35 am	Bell Une call'd back and CO did perform disco. Early due to LCSC's incorrect time slot	call back from Bell UNE	Co did do disco. Per LCSC's incorrect time slot. ASKED TO REVERSE DISCO. WILL CALL CO TO GET IT DONE.
5/30/00 @ 9:45 am	Call'd LCSC and spoke w/ Rena	She confirmed LCSC typed wrong time and date for disco.	Will have to transfer to Pat @ ext. 1663 in RCMAC
5/30/00 @ 10:00 am	Spoke to Pat in RCMAC	will need to send over new paper work out to CO and Bell UNE to undo what was Done.	she will send out info. and call me
5/30/00 @ 11 am	Call from Bell UNE / CO	Recv'd a call from Willy ext 5254 and Jay ext. 1663	recv'd paper work to redo what was done and bring cust. Back up.

Finally @ 12:30 pm received a call from Bell UNE to notify us that the customer has dial tone. The customer was prematurely disconnected due to the information typed incorrectly by the LCSC. On 5/31 call'd customer to schedule new cut date and was notified to cancel order. Reason being the disconnect that had been performed the day before.

KMC00002

Joint Petitioners
Alabama Utilities Commission
Docket Nos. P-772, Sub 8 *et al.*
BellSouth's 1st Set of Request for Production
June 29, 2004

ATTACHMENTS TO REQUEST NO. 57

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(NCS/NVX 76-78)**