BELLSOUTH

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Guy M. Hicks
General Counsel

February 24, 1998

VIA HAND DELIVERY

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

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the responses of BellSouth Telecommunications, Inc. to the Data Requests of MCI Telecommunications Corp. A copy has been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

Enclosure

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REQUEST: As to the OSS BellSouth presently uses to serve its own customers:

a. List all the OSS systems BellSouth currently has in place (e.g., RNS, DOE, etc.). This should include the up-stream, "behind the scenes" systems. Provide the technical specifications for those systems, including information describing what functions each system performs, how the systems perform those functions and whether an interface can be built to the system.

b. List all the databases the system can access.

c. Describe in detail the type of information included in the databases (perhaps ask for database layouts identifying the characteristics of all data base fields).

RESPONSE: BellSouth objects to this request on the grounds that the information requested is not relevant to the scope of this proceeding. Further, BellSouth considers it proprietary information. However, subject to this objection, BellSouth affirmatively asserts that it has provided all relevant information on BellSouth's OSS to the CLECs in CLEC conferences, via CLEC account teams, during joint implementation projects, and in numerous proceedings, including proceedings before this Authority, other state regulatory authorities, and the Federal Communications Commission. Subject to the objection to this request, detailed information regarding BellSouth's OSS, including information on RNS, DOE, SONGS, and TAFI, and how BellSouth uses them may be found in the Direct Testimony of Gloria Calhoun and her corresponding exhibits and in the Affidavit of William N. Stacy and corresponding exhibits filed in this docket.

REQUEST: Provide the same information for systems BellSouth plans to implement in the next 6-12 months. MCI has heard that BellSouth is implementing a new internal OSS system to serve its end user business customers and that either this new system or the project of developing the system is Overture. Please provide:

a. Projected implementation data

b. When decision was made to implement.

c. Whether BellSouth reps are being trained on the system.

d. What system, if any, will be replace.

RESPONSE: BellSouth objects to this request on the grounds that the information is considered by BellSouth to be proprietary. However, subject to this objection, Overture will be a regional marketing and sales negotiation tool with ordering and pre-ordering functions for business customers which *may* replace DOE and SONGS. Currently, BellSouth estimates that Overture will be implemented in late 1998 or early 1999. No representatives have been trained because Overture has not been implemented.

REQUEST: Does BellSouth use PRIMS itself for internal uses? If so, for what purpose. Is this the primary such system that BellSouth uses for this purpose?

RESPONSE: BellSouth does not use a system called "PRIMS."

REQUEST: Does BellSouth use BOCRIS? If so, for what purpose? Is this the primary such system that BellSouth uses for this purpose? Explain the differences between BOCRIS and PSIMS.

RESPONSE: BOCRIS (Business Office Customer Records Information System) is a front-end presentation manager which allows appropriate BellSouth employees access to CRIS billing records for verification of information, such as circuit configurations, wiring options, and features, during troubleshooting or billing investigation activities. Appropriate employees of BellSouth's LCSC perform similar activities for CLECs. BOCRIS is also the presentation system through which the Service Order Negotiation System (SONGS, for business orders), is accessed. BOCRIS is the primary system that BellSouth uses for these purposes.

P/SIMS (Products/Services Inventory Management System) is a database containing feature availability information based on the software and hardware capabilities of the central office switch associated with the end user customer's telephone number. As central office capacity allows and as system upgrades permit, features are activated in BellSouth's switches, and the availability date is reflected in P/SIMS.

BOCRIS is a presentation system that may be used during billing investigations or trouble resolutions to determine which features an end user customer has already selected or for access to SONGS. P/SIMS is a database used to determine which features are available for selection by the end user customer.

REQUEST: State how information concerning service "jeopardies" for BellSouth's own service to end-users is communicated by technicians to the BellSouth work management center. Specifically, state:

a. What device do technicians use to transmit the information;

b. How the information is transmitted (e.g., via telephone lines);

c. What device the center uses to receive the information.

RESPONSE: (a)-(c) There are many reasons for service jeopardies, including those which can occur when a technician is on an installation call. For example, when a technician determines that he will miss his next job (and only certain technicians are assigned jobs in advance; most are not assigned to another job until after they finish their current job), he will call a maintenance administrator or a load balance supervisor. The technician uses a telephone to make this call. The maintenance administrator or the load balance supervisor receives the call via a telephone. If the technician on an installation call determines that there is a problem with the facilities, for example, a bad cable and pair, he notifies AFIG (Address and Facility Inventory Group), which receives the call via telephone. If AFIG is unable to clear the facility or find another to use, the technician "incompletes" the installation call in his CAT terminal for facility reasons. The CAT terminal transmits the information via a modem to Engineering. The appropriate business office, such as Small Business, is responsible for following-up on the order and contacting the customer.

If the installation call is on behalf of a CLEC, upon discovering a problem, the technician makes a telephone call to the CLEC. Next, he calls AFIG to attempt to clear the problem. If AFIG is unable to clear the facility or find another to use, the technician "incompletes" the installation call in his CAT terminal for facility reasons. The CAT terminal transmits the information via a modem to Engineering. The LCSC (Local Carrier Service Center) is responsible for following-up on the order and contacting the CLEC.

REQUEST: Provide the most recent three months of network blockage data on all common trunk groups utilized for CLEC traffic that experienced blockage. For the same three month period, provide.

a. blockage data on all of MCI's interconnection trunk groups from BellSouth end offices and tandems to MCI points of termination that experienced blockage;

b. blockage data on all CLEC interconnection trunk groups from your end offices and tandems to CLEC points of termination that experienced blockage;

c. similar blockage data on all trunks carrying BellSouth local traffic.

RESPONSE: The blockage data on BellSouth's Common Transport Trunk Groups (CTTG) in Tennessee is summarized as follows:

	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	513	513	513
Trunk Groups with Valid Data	513	513	513
Trunk Groups with Blockage >2%	3	4	2
Percent Groups with Blockage >2%	0.6%	0.8%	0.4%

Blockage data on the CTTG trunk groups that experienced blockage above 2% is attached following on Page 4. Detail blockage data for all trunk groups is furnished monthly to Wally Sparks and Tara Burke of MCI by BellSouth's MCI Account Team.

a. The blockage data on MCI Metro's local interconnection final trunk groups from BellSouth's end offices and tandems in Tennessee is summarized as follows:

BST Ordered	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	1	1	1
Trunk Groups with Valid Data	1	1	1
Trunk Groups with Blockage >3%	0	0	0
Percent Groups with Blockage >3%	0.0%	0.0%	0.0%

MCI Ordered	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	6	6	6
Trunk Groups with Valid Data	6	6	6
Trunk Groups with Blockage >3%	0	0	0
Percent Groups with Blockage >3%	0.0%	0.0%	0.0%

Total MCI	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	7	7	7
Trunk Groups with Valid Data	7	7	7
Trunk Groups with Blockage >3%	0	0	0
Percent Groups with Blockage >3%	0.0%	0.0%	0.0%

b. The blockage data on all CLEC interconnection final trunk groups, including MCI Metro groups, from BellSouth's end offices and tandems in Tennessee is summarized as follows:

BST Ordered	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	8	9	9
Trunk Groups with Valid Data	8	9	9
Trunk Groups with Blockage >3%	0	0	1
Percent Groups with Blockage >3%	0.0%	0.0%	11.1%

CLEC Ordered	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	52	56	61
Trunk Groups with Valid Data	50	56	61
Trunk Groups with Blockage >3%	1	0	0
Percent Groups with Blockage >3%	2.0%	0.0%	0.0%

Total CLEC	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	60	65	70
Trunk Groups with Valid Data	58	65	70
Trunk Groups with Blockage >3%	1	0	1
Percent Groups with Blockage >3%	1.7%	0.0%	1.4%

c. The blockage data on BellSouth's local groups that are comparable to CLEC interconnection final trunk groups from end offices and tandems in Tennessee is summarized as follows:

	Nov. '97	Dec. '97	Jan. '98
Total Trunk Groups	445	445	444
Trunk Groups with Valid Data	445	445	444
Trunk Groups with Blockage >3%	10	7	11
Percent Groups with Blockage >3%	2.2%	1.6%	2.5%

Blockage data on the Local trunk groups that experienced blockage above 3% is attached following on Page 5.

Common Transport Trunk Group Blockage Details

TGSN	TANDEM	END OFFICE	DESCRPT	STUDY PERIOD	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	REMARKS
AF139197	MMPHTNMA84T	MMPHTNCTDS0	77 AF DT	111797	.0532*	15	576	20	1	A0A1 +120 TRUNKS PENDING 12/12/97
AF105249	MMPHTNMA84T	DYBGTNMADS0	M- DF ET	111797	.0416*	10	48	20	1	D1I1 43/48 BOT 11/13/97
AF138684	MMPHTNMA84T	HMBLTNMADS1	M- DF ET	111797	.0426*	10	48	20	1	D1I1 38/48 BOT 11/13/97
AF130622	MMPHTNMA84T	MMPHTNELDS0	77 AF DT	121597	.0243*	15	480	18	1	B0A1 +96 12/18/97
AF139197	MMPHTNMA84T	MMPHTNCTDS0	77 AF DT	121597	.0634*	15	576	17	2	B0A1 +120 12/19/97
AF124545	NSVLTNWM92T	NSVLTNSTDS0	77 AF DT	121597	.0436*	10	576	19	1	B0A1 +96 12/17/97 & +120 12/24/97
AF124583	MMPHTNMA84T	MEDNTNMADS0	M- DF ET	121597	.0322*	16	4	19	1	D1I1 3/4 BOT 12/2/97
AF105385	NSVLTNMT86T	WHBLTNMTDS0	M- DF ET	011998	.0281*	09	14	18	1	C0E1 1/19 615/931 NPA SPLIT
AF071724	MMPHTNMA84T	MMPHTNWWCG0	7- AF TC	011998	.0222*	20	168	18	1	A0A1 +48 2/11/98

MCI Metro Trunk Group Blockage Details

None

Local Network Trunk Group Blockage Details

A-END	Z-END	DESCRIPTION	TGSN	STUDY PERIOD	OBSVD BLKG	HR	TKS	VAL DAYS	NBR RPTS	REMARKS
ADVLTNXA71T	SVNHTNMTDS0	77 DF OG	AF123107	111797	.0457*	19	144	20	4	
CHTGTNNS90T	CLEVTNMADS0	77 AF OG KE	AF139363	111797	.0315*	19	504	20	1	
CLDGTNMADS1	NWTZTNXADS0	77 DF IE	AF139094	111797	.0597*	19	120	20	4	
DYBGTNMADS0	MMPHTNMA84T	M- DF IR	AF145297	111797	.0458*	10	6	20	1	
HMBLTNMADS1	MMPHTNMA84T	M- DF IR	AF145322	111797	.0437*	15	4	17	1	
KNVLTNWHDS0	KNVLTNMA84T	M- DF IR	AF145180	111797	.0594*	06	8	20	1	
KNVLTNWH01T	SVVLTNMTDS0	77 AF OG KE	AF147256	111797	.0372*	19	168	17	1	
LRBGTNMADS0	LRTTTNXADS0	MM DF IE DI	AF142949	111797	.3790*	11	5	19	6	
MDVITNMTDS0	VONRTNXADS0	77 DF IE	AF124157	111797	.0760*	19	60	18	3	
MTJLTNXADS2	NSVLTNMT7GT	77 AF OG KE	AF135896	111797	.0664*	20	550	18	3	
CHTGTNNS90T	CLEVTNMADS0	77 AF OG KE	AF139363	121597	.0797*	20	504	19	2	
CLDGTNMADS1	NWTZTNXADS0	77 DF IE	AF139094	121597	.0506*	18	120	19	5	
DNRGTNMADS0	KNVLTNMA84T	M- DF IR	AF145173	121597	.0449*	12	6	19	1	
KNVLTNWHDS0	KNVLTNMA84T	M- DF IR	AF145180	121597	.0349*	06	12	19	2	
LRBGTNMADS0	LRTTTNXADS0	MM DF IE DI	AF142949	121597	.4148*	08	5	19	7	
MDVITNMTDS0	VONRTNXADS0	77 DF IE	AF124157	121597	.0979*	20	60	19	4	
MTJLTNXADS2	NSVLTNMT7GT	77 AF OG KE	AF135896	121597	.0307*	20	550	17	4	
ADVLTNXA71T	SVNHTNMTDS0	77 DF OG	AF123107	011998	.2345*	20	144	17	1	
CHRLTNMTDS0	NSVLTNBW01T	77 AF OG	AF137621	011998	.0520*	20	48	18	1	
CHTGTNMVDS0	CHTGTNNS90T	77 AF OG KE	AF139312	011998	.0703*	19	792	17	1	
CHTGTNNS90T	CLEVTNMADS0	77 AF OG KE	AF139363	011998	.1382*	19	504	17	3	
CLDGTNMADS1	NWTZTNXADS0	77 DF IE	AF139094	011998	.1080*	19	120	17	6	
CLTNTNMA71T	OKRGTNMTDS0	77 DF OG	AF132670	011998	.0305*	20	240	18	1	
HCRDTNXADS1	KNVLTNMA90T	77 AF OG KE	AF126989	011998	.0352*	20	428	17	1	
LRBGTNMADS0	LRTTTNXADS0	MM DF IE DI	AF142949	011998	.4183*	21	5	18	8	
MDVITNMTDS0	VONRTNXADS0	77 DF IE	AF124157	011998	.0609*	20	60	16	5	
MMPHTNMADS0	MMPHTNMT73T	77 AF OG	AF091994	011998	.1474*	15	684	17	1	
MTJLTNXADS2	NSVLTNMT7GT	77 AF OG KE	AF135896	011998	.1894*	20	550	15	5	

REQUEST: State whether BellSouth will permit CLECs to interconnect at BellSouth's local tandems. State what information is necessary to permit interconnection at the local tandems and whether all such information has been provided previously. State whether, once a CLEC is interconnected at the BellSouth local tandem, the CLECs traffic will travel on the same trunk groups as BellSouth's local traffic and whether all existing independent telephone company local and EAS traffic routes served by the local tandem has been identified and made available to CLEC traffic.

RESPONSE: BellSouth's Local Tandem interconnection allows a CLEC's local traffic to terminate to BST end offices within the local calling area served by a given local tandem. BellSouth may chose to deliver local traffic from these end offices to the CLEC from these same local tandems. At present, BST will not deliver traffic to other network service providers interconnected to BST's local tandem or BST's access tandem via this local tandem interconnection arrangement. Traffic originated by and terminating to network service providers other than BST (i.e. Competing Local Exchange Companies (CLECs), Independent Telephone Companies(ITCs), and Interexchange Carriers (IXCs)) is offered only at BST's access tandems.

If a local calling area is served by more than one local tandem, the CLEC may elect to connect to one, some or all local tandems serving that local calling area. The local tandem interconnection arrangement requires a specific type trunk translation the same switch translations as does the access tandem, and a Cellular Mobile Carrier (CMC) software package to make an Automatic Message Accounting (AMA) record for billing purposes.

REQUEST: Regarding PCS providers in Tennessee, provide all facts that BellSouth has to support its claim that PCS is a "Track A" provider in Tennessee. Provide all documents substantiating this claim as well as all sources from which BellSouth has collected information used to arrive at this claim.

RESPONSE: In the FCC's Memorandum Opinion and Order (CC Docket No. 97-231) released February 4, 1998, paragraph 72, the FCC states "the final sentence of subparagraph 271(c)(1)(A)excludes only cellular carriers, and not PCS carriers, from being considered facilities-based competitors." The FCC further concluded that "section 271 does not preclude the Commission from considering the presence of a PCS provider in a particular state as a facilities-based competitor."

BellSouth agrees with the FCC in its assessment that PCS providers may be used to satisfy Track A requirements in any state where they are currently operational including Tennessee.

PCS providers currently advertise and provide facilities-based service to business and residential customers in Tennessee.

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 1998, a copy of the foregoing document was served on the parties of record, via facsimile or hand delivery addressed as follows:

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