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OFFICE OF THE
EXECUTIVE SECRETARY

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 AT&T Communications of the South Central States. Proprietary responses will be provided as soon as the Protective Order has been entered in this docket. A copy of the non-proprietary responses have been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

Enclosure

111304

REQUEST: Does BellSouth collect and maintain the following data regarding the processing of resale orders:

(a) the number of resale orders requesting service migration (i.e., switch-as-is or switch-as-specified) received by BellSouth from CLECs;
(b) the number of resale orders requesting new service installation received by BellSouth from CLECs;
(c) the number of resale orders requesting service changes (for existing CLEC customers) received by BellSouth from CLECs;
(d) the number of resale orders received by BellSouth from CLECs via LENS;
(e) the number of resale orders received by BellSouth from CLECs via EDI;
(f) the number of resale orders received by BellSouth from CLECs via means other LENS or EDI;
(g) the number of resale orders sent from LEO (Local Exchange Ordering) to LESOG (Local Exchange Service Order Generator);
(h) the number of LENS resale orders sent from LEO to LESOG;
(i) the number of EDI resale orders sent from LEO to LESOG;
(j) the number of resale orders rejected by LEO;
(k) the number of LENS resale orders rejected by LEO;
(l) the number of EDI resale orders rejected by LEO;
(m) the number of resale orders sent from LEO to LCSC (Local Carrier Service Center);
(n) the number of LENS resale orders sent from LEO to LCSC;
(o) the number of EDI resale orders sent from LEO to LCSC;
(p) the number of resale orders sent from LESOG to SOCS (Service Order Centralization System);
(q) the number of LENS resale orders sent from LESOG to SOCS;
(r) the number of EDI resale orders sent from LESOG to SOCS;
(s) the number of resale orders sent from LESOG to the LCSC;
(t) the number of LENS resale orders sent from LESOG to the LCSC;
(u) the number of EDI resale orders sent from LESOG to the LCSC;
(v) the number of resale orders received by the LCSC from LEO that are rejected;

REQUEST:

(w) the number of LENS resale orders received by the LCSC from LEO that are rejected;

(x) the number of EDI resale orders received by the LECS from LEO that are rejected;

(y) the number of resale orders received by the LCSC from LESOG that are rejected;

(z) the number of LENS resale orders received by the LCSC from LESOG that are rejected;

(aa) the number of EDI resale orders received by the LCSC from LESOG that are rejected;

(ab) the number of resale orders sent from the LCSC to SOCS;

(ac) the number of LENS resale orders sent from the LCSC to SOCS;

(ad) the number of EDI resale orders sent from the LCSC to SOCS

(ae) the number of resale orders rejected by LESOG;

(af) the number of LENS resale orders rejected by LESOG;

(ag) the number of EDI resale orders rejected by LESOG;

(ah) the number of resale orders rejected by SOCS;

(ai) the number of LENS resale orders rejected by SOCS;

(aj) the number of EDI resale orders rejected by SOCS;

(ak) the number of resale orders sent from SOCS to LCSC;

(al) the number of LENS resale orders sent from SOCS to LCSC;

(am) the number of EDI resale orders sent from SOCS to LCSC;

(an) the number of resale orders received by the LCSC from SOCS that are rejected;

(ao) the number of LENS resale orders received by the LCSC from SOCS that are rejected;

(ap) the number of EDI resale orders received by the LCSC from SOCS that are rejected;

(aq) the number of resale orders processed by SOCS without prior intervention by the LCSC;

(ar) the number of LENS resale orders processed by SOCS without prior intervention by the LCSC;

(as) the number of EDI resale orders processed by SOCS without prior intervention by the LCSC;

RESPONSE:

(a) Yes, but segmented by Dispatch and Non-Dispatched and collected as an aggregate of all orders.
(b) Yes, but segmented by Dispatch and Non-Dispatched and collected as an aggregate of all orders.
(c) Yes, but segmented by Dispatch and Non-Dispatched and collected as an aggregate of all orders.
(d) Yes
(e) Yes
(f) Yes
(g) Yes
(h) No, not broken down by LENS
(I) No, not broken down by EDI
(j) Yes
(k) No, not broken down by LENS
(l) No, not broken down by EDI
(m) Yes, collected and maintained as an aggregate of all order types
(n) No, not broken down by LENS
(o) No, not broken down by EDI
(p) No, do not currently track this way
(q) No, do not currently track this way
(r) No, do not currently track this way
(s) No, do not currently track this way
(t) No, do not currently track this way
(u) No, do not currently track this way
(v) Same as "m" above
(w) Same as "n" above
(x) Same as "o" above
(y) Same as "s" above
(z) Same as "t" above
(aa) Same as "u" above
(ab) Yes, as an aggregate of all orders, not just resale
(ac) No, not broken down by LENS
(ad) No, not broken down by EDI
(ae) Same as "s" above
(af) Same as "t" above
(ag) Same as "u" above
(ah) No
(ai) No, not broken down by LENS
(aj) No, not broken down by EDI
(ak) No

RESPONSE:

(al) No, not broken down by LENS
(am) No, not broken down by EDI
(an) Yes, as an aggregate of all orders, not just resale
(ao) No, not broken down by LENS
(ap) No, not broken down by EDI
(aq) Yes, as an aggregate of all orders, not just resale
(ar) No, not broken down by LENS
(as) No, not broken down by EDI

REQUEST: With respect to resale orders sent from LEO, LESOG, or SOCS to the LCSC, how many orders were subsequently: (a) rejected; (b) entered into SOCS; or (c) not resolved or processed further. If any orders were not resolved or processed further, please explain what action was taken, if any, and why.

RESPONSE: This request is objectionable because it is vague and unclear. LEO is a database, LESOG processes information stored in LEO and SOCS is the service order communications system. Without waiving its objection, in response BellSouth assumes that what AT&T is requesting is a measurement of orders flowing from LESOG to SOCS and the fallout from SOCS. This would be inclusive of all orders and there would be no orders that were not resolved or processed further as suggested in AT&T's request. The numbers are included in the Flow-Through report attached as Attachment 1.

REQUEST: For each data item in Interrogatory No. 1 that BellSouth answers in the affirmative, please:

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
(c) state period of time covered by the database;

RESPONSE: (a) All "N", "C", and "T" order types as an aggregate which includes Resale, UNEs, and Local Interconnection Trunking.

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: Does BellSouth collect and maintain the following data regarding provisioning notices:

(a) the period of time between the initial receipt of each resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
(b) the period of time between the initial receipt of each LENS resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
(c) the period of time between the initial receipt of each EDI resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
(d) the period of time between the initial receipt of a resale order and the transmission of a Completion Notice to the CLEC;
(e) the period of time between the initial receipt of a LENS resale order and the transmission of a Completion Notice to the CLEC;
(f) the period of time between the initial receipt of a EDI resale order and the transmission of a Completion Notice to the CLEC;
(g) the period of time between the initial receipt of a resale order and the transmission of a Rejection Notice to the CLEC;
(h) the period of time between the initial receipt of a LENS resale order and the transmission of a Rejection Notice to the CLEC;
(I) the period of time between the initial receipt of a EDI resale order and the transmission of a Rejection Notice to the CLEC;
(j) the period of time between the transmission of a Jeopardy Notice to CLEC and the due date/appointment at jeopardy;
(k) the period of time between actual completion and the transmission of a Completion Notice to the CLEC;
(l) the number of FOCs that were transmitted by LENS and EDI;
(m) the number of CNs that were transmitted by LENS and EDI;
(n) the number of rejections that were transmitted by LENS and EDI;
(o) the number of jeopardies that were transmitted by LENS and EDI;
(p) the number of FOCs that were transmitted by facsimile or telephone;

REQUEST:

(q) the number of FOCs that were transmitted by facsimile or telephone;
(r) the number of CNs that were transmitted by facsimile or telephone;
(s) the number of rejections that were transmitted by facsimile or telephone;
(t) the number of jeopardies that were transmitted by facsimile or telephone;

RESPONSE:

(a) Yes
(b) No, not broken down this way
(c) No, not broken down this way
(d) No
(e) No
(f) No
(g) Yes
(h) No, not broken down this way
(i) No, not broken down this way
(j) No
(k) No
(l) Yes, as an aggregate total based on mechanized flow-through
(m) No
(n) Yes, as an aggregate total based on mechanized flow-through
(o) No
(p) Yes
(q) Yes
(r) No
(s) Yes
(t) No

REQUEST: For each data item in Interrogatory No. 4 that BellSouth answers in the affirmative, please;

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element;
(c) state period of time covered by the database;

RESPONSE: (a) All "N", "C", and "T" order types as an aggregate which includes Resale, UNEs, and Local Interconnection Trunking.

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: Does BellSouth collect and maintain the following data regarding due dates:

(a) the number of requested due dates met for resale orders;
(b) the number of requested due dates not met for resale orders;
(c) the number of requested due dates changed by the FOC;
(d) the number of requested due dates not changed by the FOC;
(e) the number of confirmed due dates (i.e., confirmed by FOC) met for resale orders;
(f) the number of confirmed due dates not met for resale orders;
(g) the period of time between the requested due date and the confirmed due date, if different, and
(h) the period of time between initial receipt of resale order and actual completion.

RESPONSE:
(a) Yes, for mechanized orders only
(b) Yes, for mechanized orders only
(c) Yes, for mechanized orders only
(d) Yes, for mechanized orders only
(e) Yes, for mechanized orders only
(f) Yes
(g) Yes, for mechanized orders only
(h) Yes

REQUEST: For each data item in Interrogatory No. 6 that BellSouth answers in the affirmative, please:

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each element; and
(c) state period of time covered by the database.

RESPONSE: (a) All "N", "C", and "T" order types as an aggregate which includes Resale, UNEs, and Local Interconnection Trunking.

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: Does BellSouth collect and maintain the following data regarding resale orders for which BellSouth did meet the requested due date or confirmed due date:

(a) the period of time between the requested due date and actual completion;
(b) the period of time between the confirmed due date and actual completion;
(c) whether the order was processed electronically or required human intervention by BellSouth;

RESPONSE:
(a) Yes, for mechanized orders
(b) Yes, for mechanized orders
(c) Yes, identified as Dispatched or Non-Dispatched

REQUEST: For each data item in Interrogatory No. 8 that BellSouth answers in the affirmative please:

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each element and;
(c) state period of time covered by the database.

RESPONSE:

(a) All "N", "C", and "T" order types as an aggregate which includes Resale, UNEs, and Local Interconnection Trunking.

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: Does BellSouth collect and maintain the following data regarding UNE orders:

(a) the number of total orders for: (i) unbundled loops; (ii) unbundled ports;
(b) the number of EXACT orders for: (i) unbundled loops; (ii) unbundled ports;
(c) the number of EDI orders for: (i) unbundled loops; (ii) unbundled ports;
(d) the number of LENS orders for: (i) unbundled loops; (ii) unbundled ports;
(e) the number of total orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;
(f) the number of EXACT orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;;
(g) the number of EDI orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;;
(h) the number of LENS orders for: (i) unbundled loops; (ii) unbundled ports;
(i) the period between receipt of order for unbundled loops and actual order completion;
(j) the period between receipt of order for unbundled port and actual order completion;
(k) the number of orders for unbundled loops that BellSouth processes electronically without additional human intervention;
(l) the number of orders for unbundled ports that BellSouth processes electronically without additional human intervention;
(m) the period of time between receipt of UNE order and transmission of FOCs;
(n) the period of time between receipt of UNE order and transmission of CNs;
(o) the period of time between receipt of UNE order and transmission of rejection;

RESPONSE:
(a) Yes
(b) No, due to the transition to EDI & LENS. AT&T has had no activity.
(c) Yes
(d) Yes

RESPONSE (cont'd):

(e) Yes
(f) No, due to the transition to EDI & LENS. AT&T has had no activity.
(g) Yes
(h) Yes
(I) Yes, based on receipt of valid order, not LSR
(j) Yes, based on receipt of valid order, not LSR
(k) Yes, aggregated with resale orders, not tracked separately
(l) Yes, aggregated with resale orders, not tracked separately
(m) Yes, aggregated with resale orders, not tracked separately
(n) No
(o) Yes, aggregated with resale orders, not tracked separately

REQUEST: For each data item in Interrogatory No. 10 that BellSouth answers in the affirmative, please:

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element;
(c) state period of time covered by the database;

RESPONSE: (a) All "N", "C", and "T" order types as an aggregate which includes Resale, UNEs, and Local Interconnection Trunking.

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: With respect to the API Gateway:

(a) Describe the business rationale for BellSouth's decision to develop the API Gateway;
(b) Describe each purpose for which BellSouth anticipates the API Gateway will be utilized;
(c) Describe with specificity all entities that BellSouth anticipates may utilize the API Gateway;
(d) Describe the expected time frame for development of the API Gateway, including the date(s) on which the API Gateway is expected to be available to CLECs and any BellSouth affiliate

RESPONSE:

(a) BellSouth decided to develop the API Gateway based on requests by CLECs for another kind of interface.

(b) The API Gateway will be used for pre-ordering and ordering.

(c) BellSouth does not know which CLECs will choose to use the API Gateway when it is completed.

(d) The API Gateway is currently scheduled to be available on December 31, 1998.

REQUEST: For every function (i.e., preordering, ordering, billing, maintenance and repair) for each interface (e.g., EDI, LENS, TAFI), please provide the following information regarding capacity for all states served by BellSouth:

(a) State the maximum capacity in terms of CLEC transactions per hour;

(i) State the basis for determining this capacity.

(ii) Identify any assumptions that were made in calculating capacity, including but not limited to:

(A) the percentage of CLEC transactions that are expected to require complete manual processing for each function;

(B) the percentage of CLEC transactions that are expected to fall out for some manual processing;

(C) the resources to be devoted to each OSS function; and

(D) the average time required to perform each OSS function.

(b) State the maximum capacity in terms of simultaneous users;

(i) State the basis for determining this capacity.

(ii) Identify any assumptions that were made in calculating capacity

(c) With respect to the capacity for LENS pre-ordering (both transactions per hour and simultaneous users);

(i) provide the information requested above for the inquiry mode and the firm over mode.

(ii) state what constitutes a pre-ordering transaction for the purpose of calculating pre-ordering capacity.

RESPONSE: The following information is provided for the CLEC TAFI system. Since the original deployment of TAFI in BellSouth, the application has been running on the NCR 4550 platform. We have recently ported TAFI to run on the SUN E5000 platform which provides increased performance and capacity. We will be migrating CLEC users to the SUN platform in March 1998 and therefore data for both platforms is provided.

a) NCR Platform: 2600
SUN Platform: 3000

(ii) NCR Platform = [65 simultaneous users/processor] X [20 reports/user/hr] X [2 Production Platform]

SUN Platform = [150 simultaneous users/processor] X [20 reports/user/hr] X [1 Production Platform]

Note: The NCR platform is fully equipped and additional capacity requires adding additional platforms. The SUN platform is configured at 2/3 capacity (only 8 out of 12 processors installed). Therefore the one SUN platform can be quickly upgraded to provide 225 simultaneous users (4500 reports/hr) if load requirements approach this level.

(ii) (A) 0% (All reports entered via TAFI are mechanical.)
(B) 15%

(Based upon actual RRC/BRC data for the months of August through December 1997, 7,465,100 TAFI reports were evaluated. TAFI correctly processed 87% of the 6,328,079 residence reports and 75% of the 1,137,021 business reports handled. Therefore, the combined report processing (where TAFI determined the resolution path without manual intervention) is 85%. We anticipate CLEC trouble reports to maintain similar ratios of residence and business.

C) NCR Platform: 2 Production and 1 Back-up Platform
SUN Platform: 1 Production and 1 Back-up Platform

D) The average time per trouble report processed in TAFI is 3 minutes.

RESPONSE (cont'd):

b) NCR Platform: 130 (65 per Production Platform)
SUN Platform: 150 (which could be increased to 225 by adding processors)

i) Users were added to the platform and system response time monitored. Screen response times exceeding 6 seconds were considered unacceptable.

On the NCR platform, 65 simultaneous users were determined as the maximum volume while maintaining acceptable response times. Adding users over 65 significantly impacted performance.

For the SUN platform, testing in January 1998 had 106 simultaneous users with no noticeable response time delays. Information Technologies (IT), using various system performance monitoring tools, determined that the current configuration would accommodate 150 simultaneous users. This design limit represents the 80% capacity figure and up to 190 simultaneous users would still yield acceptable response times.

ii) For the NCR platform, actual load testing determined capacity.

For the SUN platform, load testing with 106 simultaneous users demonstrated excellent response times. IT employed industry acceptable system analysis techniques to project the 150 user (80% capacity) limit.

REQUEST: With respect to the notices of completion sent by BellSouth to the CLECs for Tennessee and the BellSouth region, state:

(a) whether the "completion date" set forth on such notices has always been the date on which the service was actually completed, as opposed to other dates (such as the "CPX" date); and

(b) if your answer is in the negative, describe what other date has been used as the "completion date" on the notice, and the time period during which that date was so used.

RESPONSE: (a) The completion date is the CPX date.

(b) The CPX date is the date when the order is error-free, completed, and ready to be worked by CRIS, the billing system. The CPX date may be the same as the date the service was completed. If there is a billing problem, the CPX date will indicate when the billing problem is cleared, which may be after the service was completed.

REQUEST:

(a) Identify all OSS interfaces that BellSouth: (i) has made available to CLECs; and (ii) intends to make available to CLECs. If a particular OSS interface is not currently available, please state the date on which BellSouth expects the interface to be available.

(b) For each OSS interface identified above, identify each CLEC that: (i) is using that interface; (ii) has requested to use that interface.

RESPONSE:

(a)(i) LENS, LENS CGI, EC-LITE, EDI, EDI-PC, EXACT, TAFI, T1M1 IXC, T1M1 IXC via EC-CPM, ODUF, ADUF

(a)(ii) ECTA Gateway (March 2, 1998), API (December 31, 1998)

(b) BellSouth objects to providing the identity of each CLEC ordering each type of interface on the grounds that this information is proprietary.

(i) Subject to this objection, in January, 1998, 40 CLECs submitted orders using LENS, 11 CLECs submitted orders using EDI and EDI-PC, 13 CLECs used TAFI, and 19 CLECs used ODUF. Additionally, 1 CLEC is using EC-LITE. 78 CLECs have connectivity to TAFI, while 106 have connectivity to LENS.

(ii) Subject to this objection, 2 CLECs have requested to use the ECTA Gateway, 51 CLECs have requested to use LENS and TAFI, 20 CLECs have requested to use EDI, and 1 CLEC has requested to use ADUF.

REQUEST:

(a) Identify each CLEC that has requested use of CGI to connect electronically to the LENS interface.

(b) Identify each CLEC that is currently using CGI to connect electronically to the LENS interface.

(c) Identify each CLEC that plans to use the current version of CGI to connect electronically to LENS interface.

RESPONSE:

(a) BellSouth objects to providing the identity of each CLEC ordering each type of interface on the grounds that this information is proprietary. Subject to this objection, the updated version of the CGI specification has been available since December 15, 1997. One CLEC has expressed interest, but no implementation team has been formed.

(b) None at this time.

(c) BellSouth objects to providing the identity of each CLEC ordering each type of interface on the grounds that this information is proprietary. BellSouth is not responsible for knowing the business plans of CLECs. Please see BellSouth's response to Item no. 16(a).

REQUEST: State the average period of time between receipt of a PIC change request and the completion of the switch in a retail customer's interexchange carrier.

RESPONSE: BellSouth's policy is that any PIC changes requested during normal business hours are completed by the next day unless a later date is requested by the customer. This policy is the same for both Carrier PIC and Local PIC changes.

REQUEST: Describe any performance standards, measurements, and reporting mechanisms that BellSouth uses or will use to monitor its performance in it own local retail operations in the following areas:

(a) Ordering
- (i) Number of orders received;
- (ii) Number of orders processed without human intervention after initial entry into BellSouth's OSS;
- (iii) Number of orders processed with additional human intervention after initial entry;
- (iv) Number of orders rejected;
- (v) Ordering accuracy (i.e., the same services requested by the customer are the same services reflected in the service order)

(b) Provisioning
- (i) Period of time between receipt of order and notification equivalent to a FOC or rejection;
- (ii) Period of time between receipt of order and completion;
- (iii) Provisioning accuracy (i.e., the same services reflected in the service order are provisioned to the customer);
- (iv) number of orders where requested due dates are changed;
- (v) number of orders where BellSouth does not meet requested due dates;
- (vi) number of orders where BellSouth does not meet confirmed due dates;
- (vii) number of orders where BellSouth fails to meet confirmed due dates and fails to provide jeopardy notice;

(c) Maintenance and Repair
- (i) Number of trouble reports
- (ii) Number of repeat trouble reports
- (iii) period of time between receipt of trouble order and restoration of service
- (iv) Number of service outages over 24 hours.

REQUEST (cont'd):

(d) Billing
- (i) Quality
- (ii) Timeliness
- (iii) Accuracy

RESPONSE: The following BST performance measurements identified as being available are included in the AT&T monthly performance report delivered to AT&T on the 15th day of each month.

(a) Ordering
- (I) Denominator used for % Provisioning Appointments Met
- (ii) Not tracked separately
- (iii) Not tracked separately
  note: Total orders processed (aggregate of ii and iii) is the numerator used for % Provisioning Appointments Met
- (iv) Not tracked
- (v) Not tracked

(b) Provisioning
- (I) Not tracked
- (ii) "N","T", and "C" Service Order Interval Report
- (iii) % Provisioning troubles within 30 days of installation
- (iv) Not tracked
- (v) Not tracked
- (vi) % Provisioning Appointments Met
- (vii) BellSouth's goal is to notify of jeopardies 100% of the time. There is no measurement data available.

(c) Maintenance and Repair
- (I) Numerator for % Trouble Report Rate
- (ii) % Maintenance Repeat Troubles within 30 days
- (iii) Maintenance Average Duration
- (iv) % Out of Service < 24 Hours

(d) Billing
- (I) "format and content", AT&T monthly Performance Report
- (ii) "days delay", AT&T monthly Performance Report
- (iii) "data packs", AT&T monthly Performance Report

REQUEST: For each data item in Interrogatory No. 18 that BellSouth answers in the affirmative, please:

(a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
(b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
(c) state period of time covered by the database;

RESPONSE: (a) All BST "N", "C", and "T" order types as an aggregate

(b) BellSouth objects to this request as being overly broad and unduly burdensome due to the voluminous amount of information required to respond. Moreover, some of the requested information is proprietary.

(c) Information in the database is generally maintained for one year.

REQUEST: Does BellSouth maintain data regarding the number of "backlogged" service orders (i.e., service orders that have been received and are awaiting entry into SOCS)? If yes, please:

(a) State whether BellSouth maintains such data for CLEC orders, BellSouth's own retail operations, or both;
(b) Describe how such data is maintained;
(c) Describe, for the period beginning January 1, 1997;
    (1) the number of backlogged orders for BellSouth's retail operations;
    (2) the average period of time orders were backlogged for BellSouth's retail operations;
    (3) the number of backlogged orders for all CLECs;
    (4) the number of backlogged resale orders;
    (5) the average period of time resale orders were backlogged;
    (6) the number of backlogged orders for unbundled network elements;
    (7) the average period of time orders for unbundled network element orders were backlogged.

RESPONSE: No, SOCS does not have a backlog of orders. SOCS either processes the orders, or rejects them with an error message when orders contain errors that need to be corrected prior to order processing by SOCS. This is true for CLEC and retail orders.

REQUEST: Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, that can be ordered using each of the following interfaces:

(a) EDI;
(b) EXACT;
(c) LENS;
(d) API Gateway.

RESPONSE: (a) EDI - 2-wire analog loop, 2-wire analog port, INP, 2-wire analog loop + INP.
(b) EXACT - 1-way trunking, 2-way trunking, multiple tandem interconnection, 800 database, LIDB, DACC, CCS7 A-Link Signaling, CCS7 B-Link Signaling.
(c) LENS - any UNE via the remarks section only
(d) API Gateway - does not exist yet. When the API gateway is available in the second half of 1998, it will have the same UNEs ordering capability as EDI.

REQUEST: Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, for which maintenance and repair services can be ordered using the following interfaces:

(a) TAFI;
(b) EBI.

RESPONSE: Maintenance and repair services are not "ordered" via any maintenance and repair interface. These interfaces can handle maintenance and repair functions for the following UNEs:

(a) TAFI - any telephone number based UNE, such as port, INP.
(b) EBI - all UNEs.

REQUEST: Describe how BellSouth determines the order in which it provides service to its own retail customers. To the extent that BellSouth does not provide service strictly on a first-come, first-served basis, describe:

(a) the circumstances, class of service, or class of customers that are served on other that a first-come first-served basis;
(b) the extent that BellSouth gives some customers or services priority, precedence or preference over others in terms of the installation or repair of service, including the reasons of any such prioritizing, precedence, or preference;
(c) the extent to which BellSouth has an established system for assigning some customers or services priority, preference or precedence over others in the installation or repair of service, including the assignment of codes to designate such prioritized, preferenced, or preferred customers or services.

RESPONSE: With the exception of medical emergencies, life threatening situations or recovery from natural disasters, BellSouth serves its customers on a first come first serve basis.

REQUEST: State whether BellSouth has retained or otherwise requested any outside consultant, or any other independent third party, to study, evaluate, review, or analyze the performance and/or capacity of its operations support systems, including interfaces, the access that BellSouth provides to its OSS to CLECs, and the performance of BellSouth personnel (including the BellSouth Local Carrier Service Center) who process orders submitted by CLECs. If your answer is in the affirmative, identify;

(a) the name(s) of the outside consultant(s) or other independent evaluators;
(b) the date on which the consultant(s) was initially contacted by BellSouth concerning each study, evaluation, review, or analysis;
(c) the nature, scope, and purpose of each study, evaluation, review, or analysis that was conducted;
(d) the date(s) on which agreement was reached for the consultant(s) to undertake each study, evaluation, review, or analysis;
(e) the proposed and actual beginning and end dates of each study, evaluation, review, or analysis;
(f) the results of each study, evaluation, review, or analysis;
(g) any reports or other documents prepared by the outside consultant(s) or independent evaluator(s), in connection with each study, evaluation, review, or analysis; and
(h) any concerns, problems, deficiencies, recommendations or areas needing improvement that the consultant(s) identified with respect to BellSouth's OSS, including but not limited to concerns, problems, deficiencies, or areas that need improvement with respect to (1) capacity, (2) parity of access for CLECs, (3) testing, (4) mechanization of interfaces, (5) manual intervention, (6) human error, (7) performance measurement, (8) speed, (9) quality, and (10) ease of use.

RESPONSE: (a) BellSouth used the following third party auditors: for OS certification, Ernst & Young (E&Y); for LCSC performance certification, DeWolff, Boberg and Associates (DBA).

RESPONSE (cont'd):

for Ernst & Young

(b) E&Y was contacted on August 1, 1997.

(c) The purpose of E&Y's effort with BellSouth is to provide a third party evaluation and certification of BellSouth's OSSs that are involved with 271 non-discriminatory access OSSs.

(d) Agreement was reached with E&Y on August 4, 1998

(e) E&Y's study began on August 11, 1997. The end date is to be determined.

(f) The results of their study are attached.

(g) Reports pertaining to E&Y's study are attached.

(h) There are no problems or deficiencies.

For DeWolff, Boberg and Associates (DBA).

(b) Initial contact was February 24, 1997.

(c) DBA conducted an initial analysis of the LCSC to identify operational improvement opportunities in the areas of productivity and quality.
Following the initial LCSC analysis, DBA was contracted to assist BellSouth in improving productivity and quality.

(d) On February 26, 1997, BellSouth reached agreement with DBA to perform the initial LCSC analysis.
On March 14, 1997, BellSouth agreed to contract the services of DBA to assist with the implementation of improvements to the LCSC operations.

RESPONSE (cont'd):

(e) The initial LCSC analysis was started on March 3, 1997, and completed on March 12, 1997.
The project to implement operational enhancements began on March 17, 1997, and completed on August 15, 1997.

(f) Attached are the findings from the initial analysis and three reports covering Phase I, II and III of the project to enhance productivity and quality.

(g) All reports are attached.

(h) The project to improve operations completed on schedule and all objectives were met or exceeded (see attached reports).

REQUEST: Describe in detail the BellSouth service intervals that BellSouth believes establishes or will establish that the interval for loop cut-over for CLECs are nondiscriminatory, including, but not limited to, how that interval is or shall be measured.

RESPONSE: No measurement available. Cut-overs are negotiated on an individual case basis.

REQUEST: Describe the average interval in which BellSouth initiates new local service for a retail customer, including but not limited to the various permutations of loop cut-overs performed in the central office including "win-back" customers.

RESPONSE: No measurement available. Cut-overs are negotiated on an individual case basis.

REQUEST: Describe in detail the manner in which BellSouth intends to provision unbundled network elements ("UNEs") in Tennessee in a manner that allows competing carriers to use combinations of UNEs to provide finished telecommunications services in Tennessee, as required by § 251(c)(3) of the Act. Identify where in BellSouth's SGAT this information is provided.

RESPONSE: As indicated in BellSouth's SGAT, "CLECs may combine BellSouth network elements in any manner to provide telecommunications". The methods are no different for the provision of UNEs whether a CLEC uses UNEs individually or combines them with other UNEs or its own facilities. This information is provided in Section II.F. of BellSouth's SGAT.

REQUEST: Identify all combinations of UNEs for which BellSouth intends to physically separate the individual network elements before provisioning them to CLECs who desire to use such combinations to provide service in Tennessee, and describe in detail, for each such combination, BellSouth's proposed methods and procedures for separating the elements and for allowing CLECs to use the combination of the elements in order to provide telecommunications services as required by § 251(c)(3) of the Act. Identify where in BellSouth's SGAT this information is provided.

RESPONSE: BellSouth will provision UNEs as described in the applicable ordering guidelines, interconnection agreement and technical references. CLECs will determine how to use the UNEs, i.e., whether to combine them with other BellSouth provided UNEs or to use them with the CLEC's own equipment. This information is contained in Section II.F. of BellSouth's SGAT.

REQUEST: Do the costs for the loop and the port in BellSouth's Tennessee cost studies include any costs to reflect the manner in which CLECs may use a loop/port combination to provide service in Tennessee? If so, describe in detail the manner in which such costs are included in BellSouth's Tennessee cost studies.

RESPONSE: No.

REQUEST: Does BellSouth agree that it would cost less for BellSouth to allow CLECs to purchase loops and ports as they are already combined in BellSouth's network than it would to require CLECs to purchase loops and ports separated from each other?

RESPONSE: BellSouth offers loops and ports as UNEs in compliance with the Act. BellSouth does not currently offer a port/loop combination.

REQUEST: In order to purchase a loop and port for the purpose of providing service in Tennessee, will it be necessary for a CLEC to have its own physical space to combine the loop and the port in order to be able to provide service? If so, where is this requirement set forth in BellSouth's SGAT?

RESPONSE: BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. This information is contained in section II.F.1. of BellSouth's SGAT.

REQUEST: If the answer to the previous question is "yes," does BellSouth agree that in order to provide service using a combination of UNEs, it will be necessary to purchase either physical or virtual collocation from BellSouth? If not, describe in detail how a CLEC may combine a loop and a port in own physical space without purchasing either physical or virtual collocation from BellSouth.

RESPONSE: Yes.

REQUEST: For each combination of UNEs for which BellSouth will physically separate network elements from one another before provisioning them to CLECs who wish to use combinations of UNEs to provide telecommunications services, describe in detail BellSouth's proposal for maintenance of the combined UNEs. Identify where in BellSouth's SGAT this information is provided.

RESPONSE: Unbundled network elements delivered to the CLEC's collocation space will be maintained by BellSouth in the same manner that such element was delivered to the CLEC. Section II.E. of BellSouth's SGAT provides this information.

REQUEST: What components of BellSouth's network in Tennessee are currently combined through electronic connections made from remote locations?

RESPONSE: BellSouth has various cross connect systems which allow remote connectivity. These systems have the capability to connect various facilities, ports or trunk units depending on the system design.

REQUEST: Can BellSouth made a software change from a remote location to dedicate the traffic of a specific end user customer to reserve capacity on a specific trunk?

RESPONSE: No. Traffic generated by customers of a given class of service is ordinarily arranged to be routed over a given trunk group or groups. AT&T's question implies that a specific customer in a given class of service would be routed differently than like traffic from other customers in the same class of service. BellSouth does not route traffic differently, except as required by the inherent needs of the entire given class of service. If traffic must be re-routed by BellSouth, it is re-routed for all the customers in the affected class of service.

REQUEST: Do BellSouth's ESSX, MultiServ (or equivalent service) end user customers in Tennessee have the capacity to activate and deactivate lines from remote locations?

RESPONSE: No.

REQUEST: Can BellSouth make a software change from a remote location that disconnects service on a loop for one customer, and then reestablishes service on the same loop for a second customer? If the answer is in the affirmative, describe the circumstances and manner in which BellSouth can make such a change.

RESPONSE: No, not where physical loop changes are required. Billing-only changes can be made remotely.

REQUEST: Under what circumstances, if any, will BellSouth permit CLEC technicians or a BellSouth approved vendor acting on a CLEC's behalf to have direct access to BellSouth MDF?

RESPONSE: To preserve the privacy and security of communications for BellSouth's customers, BellSouth will not permit CLEC technicians or vendors acting on behalf of the CLEC to directly access BellSouth equipment.

REQUEST: Under BellSouth's proposal to allow CLECs to combine the loop and switch through collocation, what work will be performed by (1) BellSouth technicians; (2) CLEC technicians; (3) third-party vendors? Identify where in BellSouth's SGAT this information is provided.

RESPONSE: As stated in Sections II.B.7. and XV. of BellSouth's SGAT, detailed guidelines for collocation are contained in BellSouth's Handbook for Collocation.

BellSouth will perform the work required to establish interconnection facilities between its network and the demarcation point for the collocation arrangement. This work consists of the inventory and pre-wiring of the cross-connect capacity, including the placement of all DF cross connect jumpers required to activate each cross connect, as designated by the collocator on its Firm Order document. BellSouth provides all pre-wired interconnection facility names via a Design Layout Record or a Cable and Pair Matrix to the CLEC prior to the commencement of the collocation arrangement so that the CLEC may designate which interconnection facility will be used and therefore specify the actual termination position at the demarcation point. The CLEC's BellSouth-certified vendor will engineer and install the collocation equipment , the connections between the equipment and the work required to establish connections from the collocation equipment arrangement to the demarcation point. For virtual collocation, the vendor could also complete any necessary cross-connections within the collocated equipment or provide an electronic means which would facilitate the combination of elements once correlated to the interconnection facility assignments provided by BellSouth. For Physical Collocation, the equipment may be pre-wired or the CLEC technician will perform cross-connects on the CLEC collocated equipment, either manually or electronically, to establish service to an end user customer and/or combine elements. BellSouth does not assert that these methods are the only means by which a CLEC can combine UNEs within the collocation space.

REQUEST: Where CLECs request collocated space solely for the purpose of loop/switch combination, will BellSouth require use of a POT frame? If so, for what purpose(s)? If so, will BellSouth require a cross-connection at the POT frame? Identify where in BellSouth's SGAT this information is provided.

RESPONSE: BellSouth requires the use of a POT bay or frame with all Physical Collocation arrangements as the demarcation point and to provide a test point between BellSouth's network and that of the collocator. As is customary in the industry (and as AT&T requires at its POP locations), when a third party places telecommunications equipment within another party's premises, a demarcation point(s) is established to define a clear line of responsibility. With Physical Collocation, BellSouth is responsible for testing, repair and maintenance of service and equipment on its side of the POT bay demarcation point. The collocator is responsible for the testing, maintenance and repair of service and equipment on its side of the POT bay demarcation point. BellSouth does not require the use of a POT bay or frame with Virtual Collocation since BellSouth leases the virtually collocated equipment from the collocator and assumes the maintenance and repair responsibilities at the direction of the collocator. The connections between the POT bay and the collocated equipment arrangement will be pre-wired by the certified installation vendor. BellSouth does not require or permit collocator cross-connection at the POT bay. The collocator's cross-connection of the loop and the port should occur at the collocator's equipment.

REQUEST: Describe in detail any BellSouth proposals to maintain service continuity and minimize service disruption during cutover of customer service to a CLEC that provides service via loop and switch combinations. Identify and describe any supplementary charges that BellSouth proposes for minimizing service disruption. Under what circumstances will these supplementary changes be imposed.

RESPONSE: During the UNE process of loop conversions from BellSouth to a CLEC , the customer loop is physically removed from the BellSouth switch and then reconnected to the CLEC switch. This step is necessary to effect the conversion and does not produce lengthy interruptions of end user service. There are options available to CLECs to reduce outage time. A CLEC can reduce the outage period by electing to have BellSouth provide manual coordination of the service order conversion. BellSouth also offers CLECs the option to request a specific conversion time and will then make every effort to accommodate the request.

REQUEST: Assuming a CLEC has pre-wired loop and switch connections in its collocation space to blocks on the MDF or IDF, what is the average expected duration of service outage for conversion of an existing BellSouth customer to a CLEC who provides service through a combination of UNEs? Describe in detail all assumptions underlying this estimate.

RESPONSE: The customer down time may vary depending upon whether coordination is required, the telephone number is ported, it is a designed or non-designed circuit and the type of frame in the central office.

REQUEST: Describe any testing or studies that BellSouth has undertaken or commissioned to determine the average expected duration of service outages for conversion of an existing BellSouth customer to a CLEC who provides service through a combination of UNEs. Describe the results of any such testing or studies.

RESPONSE: No such testimony or studies are available.

REQUEST: Where the additional loop length caused by collocation requires loop conditioning, who will be responsible for the conditioning? When and how will such conditioning be done? Identify where in BellSouth's SGAT this information is provided.

RESPONSE: There will be no significant increase to the loop length as a result of provisioning the loop to a collocation space. Typically, the loop and the associated cross-connect to the collocation space would not be any longer than the loop and the associated cabling to a BellSouth switch. BellSouth will make whatever adjustments are necessary to ensure that the unbundled loop types requested meet the appropriate characteristics. The CLEC would be responsible for making any adjustments between its collocation space and the CLEC switch. In addition, due to the fact that the loop is not connected to the BellSouth switch, the CLEC will be responsible for providing any switched-based conditioning.

REQUEST: Describe the methods and procedures BellSouth proposes to ensure adequate updating of engineering records affected by increased loop lengths required to allow CLECs to use combinations of the loop and switch in collocated space, including but not limited to (a) BellSouth's proposal to ensure engineering records are updated to reflect new loop lengths; (b) the engineering records BellSouth will access or modify to separate already combined elements, and to allow CLECs to complete combination of UNEs; and (c) whether BellSouth will provide CLECs access to the engineering records that are accessed or modified in connection with the separation and combination of UNEs.

RESPONSE: There will be no significant increase to the loop length as a result of provisioning the loop to a collocation space. Typically, the loop and the associated cross-connect to the collocation space would not be any longer than the loop and the associated cabling to a BellSouth switch.

REQUEST: What trouble is reported on the line of a customer of a CLEC who provides service through a combination of UNEs, what methods or procedures does BellSouth propose for responding? Identify all manuals, handbooks, operating procedures, or other documents which contain such methods and procedures.

RESPONSE: The trouble reported should reflect the service impairment determined by the CLEC after analysis and testing. The CLEC should report the end user reported problem with specific CLEC analysis and isolation results. BellSouth recommends AT&T request the Operational Understanding Agreement be amended to include combination UNEs if a concern exists.

REQUEST: What is the maximum number of loop/switch combination orders that BellSouth will be able to provision in a single central office per day? Explain in detail all of the assumptions underlying this estimate, including but not limited to the size of the central office, the number of technicians needed to complete one order, the number of technicians working simultaneously on the MDF, the number and length of working shifts per day, and the number of central offices at which provisioning could occur on the same day at such a level.

RESPONSE: BellSouth is committed to being the provider of choice and as such is committed to employing the appropriate forces to meet the demands of the CLECs. However, the number of connections that can be completed in a single day varies day to day and varies from C.O. to C.O. BellSouth is prepared to work orders by the due date. A CLEC should refer large projects to the CLEC's BellSouth Account Team to assure project handling and dedicated central office personnel. In addition, the CLEC should provide a service forecast to the Account Team, which will assist BellSouth in anticipating load requirements.

REQUEST: Describe any testing or studies that BellSouth has undertaken or commissioned to determine the maximum number of loop/switch combination orders that BellSouth could provision in a single central office per day. Describe the results of any such testing or studies.

RESPONSE: To date, BellSouth has not undertaken such a test or study. See response to Item 47.

REQUEST: What is the greatest number of loop/switch combinations that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in which BellSouth provides service?

RESPONSE: The greatest number of loop/switch combinations that BellSouth has provisioned in a central office in one day in its nine-state region is three (3), with none in Tennessee.

REQUEST: What is the greatest number of unbundled loops that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in the BellSouth region?

RESPONSE: The greatest number of unbundled loops that BellSouth has provisioned in a central office in one day in Tennessee was 67. The greatest number of unbundled loops that BellSouth has provisioned in a central office in one day in the remaining eight states within its region was 28.

REQUEST: What is the average number of cross-connections on an MDF that BellSouth currently completes in a central office per day? Describe in detail the basis for this response.

RESPONSE: BellSouth objects to this request on the grounds that the information requested is overly broad and unduly burdensome. Note that there are approximately 1600 Central Offices in BellSouth's nine-state region (See NECA Tariff FCC No. 4 for a complete list of BellSouth's central offices).

REQUEST: Will BellSouth require AT&T and other CLECs to execute a "Master Collocation Agreement" or other agreement(s) before BellSouth will make collocation available to AT&T and other CLECs.

RESPONSE: AT&T will not be required to execute a "Master Collocation Agreement", as collocation is already incorporated into the AT&T Interconnection Agreements with BellSouth. BellSouth believes that no additional modifications are required to the existing collocation section of the Interconnection Agreement. Other CLECs may include similar provisions into their interconnection agreements with BellSouth and thus obviate the need the a "Master Collocation Agreement".

REQUEST: Does BellSouth contend that modifications are needed to AT&T's interconnection agreements, in Tennessee, and throughout the BellSouth region, before BellSouth will make collocation available to AT&T? Describe any such modifications.

RESPONSE: BellSouth does not contend that modifications are needed to AT&T's Interconnection Agreements before BellSouth will make collocation available. AT&T's existing interconnection agreement has provisions for collocations. See attachment 3 to the interconnection agreement.

REQUEST: Where there is inadequate space in a central office to accommodate a CLEC's physical collocation request, by what method will BellSouth allow CLECs to combine loops and switches?

RESPONSE: Where there is inadequate space for physical collocation, BellSouth will offer virtual collocation. In a virtual collocation arrangement, the CLEC may then make arrangements for the combination of the UNEs.

REQUEST: Will BellSouth permit CLECs requesting collocation space solely for purposes of combining UNEs to obtain less than 100 square feet of space? If yes, how will BellSouth adjust its existing proposed charges for collocated space?

RESPONSE: As defined in BellSouth's Collocation Handbook, BellSouth permits a CLEC to obtain less than 100 square feet for either Virtual or Physical Collocation. Less than 100 square feet may be obtained for Physical Collocation when the CLEC does not request an equipment arrangement enclosure. If an arrangement enclosure is requested, the CLEC must obtain a minimum of 100 square feet. BellSouth's proposed charges have been structured such that an adjustment is not required when less than 100 square feet is requested. BellSouth charges for floor space on a per square foot basis. ICB Space Preparation charges are pro-rated per request based on the square footage calculation utilized by the collocator. Since an arrangement enclosure would not be utilized for arrangements less than 100 square feet, the Enclosure Construction charge does not apply. No other charges are dependent on the size of arrangement.

REQUEST: Will BellSouth offer CLECs seeking to combine UNEs a choice of either physical or virtual collocation? If so, what will be the price differential? If not, under what circumstances will virtual collocation be available?

RESPONSE: BellSouth offers CLECs a choice of either physical or virtual collocation. Prices for virtual collocation are contained in BellSouth's FCC #1 tariff, Section 20. Prices for physical collocation are contained in the interconnection agreement.

BellSouth offers CLECs a choice of either physical or virtual collocation. BellSouth has offered both physical and virtual collocation to AT&T. Where there is insufficient space on BellSouth's premises for physical collocation, virtual collocation can be provided.

BellSouth does not anticipate any difficulty fulfilling requests for virtual collocation arrangements. In the event a situation arises where a virtual collocation request cannot be accommodated, BellSouth will discuss service alternatives on a case by case basis. Timely and accurate forecasts from CLECs will assist BellSouth in meeting CLEC's physical or virtual collocation needs.

REQUEST: How many central offices, including remote switching locations, does BellSouth have (a) in Tennessee; and (b) throughout the BellSouth region? List the number of remote switching locations.

RESPONSE:	Tennessee	BellSouth
Switches (AllTypes)	202	1653
Remotes Only	100	854

REQUEST: List each central office, in Tennessee and throughout the region served by BellSouth, where BellSouth anticipates it will be unable to accommodate requests for physical collocation.

RESPONSE: BellSouth objects to this request as this request is overly broad and burdensome. BellSouth has over 1600 central offices and remote switch sites within its territory which would require individual evaluation based on specific requirements in order to determine if physical collocation can be provided.

REQUEST: How many physical and virtual collocation arrangements can BellSouth complete per month, in Tennessee, and on a region-wide basis? Explain in detail all of the assumptions underlying this estimate, including any limitations on number of collocation applications BellSouth can accommodate per month in a given geographic region.

RESPONSE: The number of arrangements that can be accommodated depends on the location, the number of requests, the work associated with each request and the commitment of both parties to jointly prioritize and plan implementation of the collocation arrangements requested.

REQUEST: Describe any intervals to which BellSouth has committed for the provision of collocated space, and to which CLECs the commitments have been made. Describe what remedies are available to CLECs if the committed intervals are not met.

RESPONSE: BellSouth negotiates mutually agreeable provisioning intervals with requesters on an individual case basis, based on the scope of work required to fulfill the particular request. BellSouth considers collocation requests as customer proprietary information and objects to the request to identify the CLECs with whom BellSouth has negotiated provisioning intervals. Intervals and remedies may be individually negotiated as part of a CLECs contract agreement.

REQUEST: Describe any testing or studies that BellSouth has undertaken or commissioned to determine whether it can meet its committed intervals for provision of collocated space. Describe in detail the results of any such testing or studies.

RESPONSE: BellSouth has not requested or completed formal studies of its ability to meet committed intervals for provision of collocated space.

REQUEST: How many requests for physical collocation has BellSouth received in Tennessee and in the region served by BellSouth?

RESPONSE: As of the most recent validated report with Report Date December 31, 1997, BellSouth has received 24 Physical Collocation requests in Tennessee and 135 Physical Collocation requests in the region, including Tennessee.

REQUEST: How many physically collocated spaces has BellSouth completed, in Tennessee and in the region served by BellSouth?

RESPONSE: As of the most recent validated report with Report Date December 31, 1997, BellSouth has completed 19 Physical Collocation spaces in Tennessee and 44 in the region served by BellSouth, including Tennessee.

REQUEST: How many requests for virtual collocation has BellSouth received in Tennessee and in the region served by BellSouth?

RESPONSE: As of the most recent validated report with Report Date December 31, 1997, BellSouth has received 38 Virtual Collocation requests in Tennessee and 208 in the region served by BellSouth, including Tennessee.

REQUEST: How many virtually collocated spaces has BellSouth completed, in Tennessee and in the BellSouth region as a whole?

RESPONSE: As of the most recent validated report with Report Date December 31, 1997, BellSouth has completed 36 Virtual Collocation arrangements in Tennessee and 154 Virtual Collocation arrangements in the region served by BellSouth, including Tennessee.

REQUEST: Will BellSouth allow a CLEC to collocate in a remote switching site that houses a BellSouth remote switching module?

RESPONSE: A CLEC may apply for collocation at a remote switching site that houses a BellSouth remote switching module. BellSouth will evaluate its ability to provide collocation at the requested location based on space availability and BellSouth's ability to fulfill the requirements specified in the CLECs Application Inquiry document on a per request basis.

REQUEST: List all remote switching sites in Tennessee and in the region served by BellSouth that cannot currently accommodate more than one physical collocation space.

RESPONSE: BellSouth evaluates its ability to provide collocation at its premises on a per Application basis, for which there is an Application fee. BellSouth offers collocation based on space availability and technical feasibility on a first come, first served basis to requesting collocators based on the order in which BellSouth receives a complete and accurate Application document, followed by a complete and accurate bona fide Firm Order.

REQUEST: Describe the method by which BellSouth will provide individual loops for combination with switches for CLECs who wish to use combinations of loops and switches to provide service, where the individual loops are currently provisioned by BellSouth using integrated digital loop carrier ("IDLC"). State whether this method is available for all customers currently served by BellSouth.

RESPONSE: BellSouth will provision individual loops that currently are provisioned using integrated digital loop carriers for combining with local ports pursuant to Attachment 2, Section 3 of the Interconnection Agreement between BellSouth and AT&T. This same arrangement is available to all CLEC customers served by BellSouth. Thus, BellSouth will "roll" the loop from the IDLC onto a universal DLC or other alternate facility at no extra charge. If no alternate facility exists, BellSouth will utilize its existing Special Construction Process to determine what additional costs would be required to provide an unbundled loop to that end-user's location. Once these loops are "un-integrated" they would be provisioned to the CLEC's collocation space to be combined with other elements as the CLEC chooses to combine them.

REQUEST: To the extent that BellSouth proposes to switch over BellSouth's IDLC customers to CLECs who provide service through a combination of UNEs by reconnecting the customer's loop to an analog line:

a. state whether space analog facilities will be available for every IDLC customer;

b. state whether the customer's service quality will be degraded by the conversion to an analog line;

c. provide an estimate of the cost of converting the loop to an analog line;

d. provide an estimate of the average customer service outage incurred during the conversion to an analog line;

e. Describe in detail the basis for your responses to (a) - (d).

RESPONSE: a. Assuming that the question intended in Item 69 a. is "state whether analog facilities will be available for every IDLC customer;", the answer is, No. BellSouth does not currently have enough spare analog facilities to convert all existing IDLC customers to analog facilities if CLECs were to take 100% market share.

b. The customers line will not be degraded for the service parameters that are described for basic telephony service. BellSouth TR73600, Unbundled Local Loop – Technical Specifications, states the signaling and voice frequency electrical characteristics that are provided by unbundled loops. These parameters will be met whether unbundled loops are provided via IDLC, UDLC, or copper cable.

c. Unbundled loops must terminate at the main distributing frame at the voice grade level to allow unbundled loops to be connected to CTSP switches. BellSouth's Cost Study Filing in Docket No. 97-01262 includes the cost of the central office terminal which is required to de-multiplex the DS1 into individual voice grade (analog) circuits. Should the appropriate facilities not be available to convert IDLC customers for CTSP services, special construction costs will be applicable in addition to the appropriate UNE cost elements.

RESPONSE (cont'd):

d. The customer service outage time associated with conversion from IDLC to an analog facility should be approximately the same as for converting any working customer line to an unbundled loop. Some BellSouth/CLEC contracts contain maximum time limits for these conversions and it is anticipated that these contractual obligations can still be met where IDLC lines must be converted to analog lines.

e. See above.

REQUEST: What percentage of BellSouth loops are currently provisioned using IDLC, in Tennessee, and throughout the region served by BellSouth? What percentage of BellSouth's customers in Tennessee does BellSouth anticipate serving by IDLC by the year 2000? By the year 2003?

RESPONSE: At year end 1997, 17% of loops in Tennessee were provided via IDLC and 19% of the loops in the regions served by BellSouth were provided via IDLC. Projections of lines served by IDLC are not available for 2000 or 2003.

REQUEST: Has BellSouth investigated any alternatives to collocation for providing UNEs to CLECs who wish to use combinations of UNEs to provide service in Tennessee? If so, please describe these alternatives and explain BellSouth's reasons for not making these alternatives available to CLECs prior to this date. If not, when will any such investigation be done.

RESPONSE: BellSouth has examined the offerings of various incumbent local exchange companies and has determined that, at present, collocation is the most appropriate arrangement for CLECs to combine unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: Will BellSouth permit CLECs to purchase UNEs as they are already combined in BellSouth's network, at individual UNE rates plus an additional "glue charge?" If so, define the "glue charge" and describe how that charge will be calculated. If not, state the basis on which BellSouth refuses to provide UNEs as they are already combined in BellSouth's network.

RESPONSE: Section II.F.3. of BellSouth's SGAT contains the combinations of network elements that BellSouth currently provides. The price for each of these combinations is the sum of the applicable individual element prices as set out in Attachment A of the SGAT. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through "direct separation and recombination," i.e., by directly disconnecting and reconnecting (through ILEC and CLEC technicians or a third party vendor) the cross-connect at the MDF at UNE rates? If not, state: (a) the basis for refusing to allow such recombination; (b) the manner in which BellSouth will provide the separated loop and switch combination; and (c) what prewiring, if any, BellSouth will permit at the MDF, the Intermediate Distribution Frame ("IDF") and/or in the CLEC's collocated space.

RESPONSE: BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through the use of permanently-installed pre-wired CLEC connector blocks on the MDF at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks: and (b) the manner in which BellSouth will provide cross-connection to the MDF.

RESPONSE: BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through the use of an electronic cross-connect system at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks: and (b) the manner in which BellSouth will provide cross-connection to the MDF.

RESPONSE: BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through use of the "recent change" process at UNE rates? If not, state the basis for refusing to allow recombination using the "recent change process."

RESPONSE: BellSouth's policy is to deliver UNEs to a CLEC's collocation space for the purpose of combining unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth is investigating the feasibility of these alternatives.

REQUEST: State the number of CLEC orders for local switching received by BellSouth in Tennessee, the number of such orders processed by BellSouth in Tennessee, and the names of those CLECs placing orders in Tennessee.

RESPONSE: BellSouth has received no orders for a port, the unbundled network element representing local switching in Tennessee.

REQUEST: Does the rate currently charged by BellSouth for unbundled local switching encompass all features and functions associated with local switching? If so, please describe those features and functions. Please also list any features and functions that are priced separately than the rate for unbundled local switching.

RESPONSE: No. The rate for unbundled local switching does not include any features or functions. BellSouth has developed costs for the individual features and functions so that rates for ports that include these features could be proposed. BellSouth is not required to offer individual vertical features on a stand alone basis. Section VI.B of BellSouth's SGAT contains information regarding the rates for local switching.

REQUEST: Describe the process by which BellSouth intends to record and bill access usage for the transport and termination of (a) an InterLATA toll call; and (b) an IntraLATA toll call for CLECs who use combinations of UNEs to provide local service. Is BellSouth's response the same for CLECs who provide local service by using their own switch? If not, please describe BellSouth's proposal with respect to access for such CLECs. Identify where in BellSouth's SGAT such information is contained.

RESPONSE: a) InterLATA toll calls originating from or terminating to an unbundled port will be recorded in the standard AMA access record structures. The CLEC will be billed for all appropriate Unbundled Network Elements associated with the call and a record for each call will be provided to the CLEC on the ADUF, if the CLEC has contracted with BellSouth for that capability.

b) IntraLATA toll calls originating from an unbundled port carried by BellSouth will be recorded in the standard AMA toll record structures. The CLEC will be billed for these calls as toll calls subject to resale rules. A record of each call will be provided to the CLEC on the ODUF, if the CLEC has contracted for that capability. IntraLATA toll calls carried by BellSouth terminating to an unbundled port will not be recorded nor billed to the CLEC. IntraLATA toll calls originating from or terminating to an unbundled port and carried by a carrier other than BellSouth will be recorded in the standard access AMA record structures. The CLEC will not be billed for these calls.

Facility-based call processing is vastly different. First, there is not an interLATA TOLL designation in the access arena. Facility based call processing versus either interstate access, intrastate access, or local.

RESPONSE (cont'd):

Second, on terminating traffic, BellSouth records in our tandem (on tandem routed calls) and passes the billing information to the CLEC via 1101 records. This applies for calls from an IXC destined to a CLEC or a call from another CLEC (local in nature) and destined to another CLEC via our tandem.

If a call originates from a CLEC and the CLEC does not send the call via our tandem, BellSouth does not know the call exists. If the call originates from a CLEC and hits the access tandem to an IXC, a non-billable recording is made. The CLEC should be sending BellSouth 1150 summary records so BellSouth can bill the IXC or other third party as is involved in the call.

See "Customer Usage Data" in Section II, Page 8 of the SGAT.

REQUEST: For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for origination of interLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

RESPONSE: No. BellSouth does not bill access charges to CLECs who provide local service by using UNEs. BellSouth will continue to bill intrastate access charges to IXCs for long distance calls made through unbundled switching. For CLECs who provide local service by using their own switch, BellSouth does not bill any access charges. This information, therefore, is not addressed in BellSouth's SGAT.

REQUEST: For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for origination of intraLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

RESPONSE: See response to Item No. 80.

REQUEST: For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for termination of interLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

RESPONSE: See response to Item No. 80.

REQUEST: For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for termination of intraLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

RESPONSE: See response to Item No. 80.

The information contained herein is proprietary and will be submitted under separate cover subject to the terms of a protective order.

REQUEST: With respect OLEC Daily Usage File (ODUF), please:

(a) state when the ODUF will contain terminating local usage from other CLECs and ICOs for use by CLECs using unbundled ports from BellSouth;
(b) state when the ODUF will contain rated messages for calls to all Information Service Providers with whom BellSouth has a contractual arrangement to provide service and collect revenue;
(c) state when BellSouth will provide CLECs with a return feed by which CLECs can return erroneous data;
(d) state when BellSouth will forward 100 percent AMA recorded messages to CLECs.

RESPONSE:
a) ODUF will not contain terminating local usage.
b) Currently scheduled for mid-year 1998.
c) Return feed processing is not a current BellSouth policy.
d) BellSouth cannot furnish AMA recorded usage by CLEC until LSPI is available and until 100% recording is deployed in all sites. Also, AT&T's contract states that BST will send only measured billable intraLATA local messages.

REQUEST: With respect to Access Daily Usage File (ADUF), please:

(a) state when the ADUF will operationally ready in light of unsuccessful ADUF testing with AT&T in Kentucky;
(b) state how many CLECs are currently receiving ADUF and how many ADUFs has BellSouth provided;
(c) state when BellSouth will be capable of providing intra-state originating and terminating access records in the ADUf along with inter-state data;

RESPONSE: a) The ADUF process has never been tested with AT&T. ADUF was operationally ready on 12/19/97.
b) None as of 2/16/98.
c) Currently, ADUF provides Interstate and Undetermined access as is BellSouth's policy.

REQUEST: Please state whether BellSouth is providing CMDS files to CLECs. If the answer is affirmative, please state the number of CLECs to which BellSouth is providing CMDS files and the number of CMDS files that BellSouth has provided.

RESPONSE: See Attachment.

MISSISSIPPI

Dataset Node	Company	OCN	RAOs
CMDS1JB	ACSI	7280	174
CMDS1JC	MEDIAONE	7170	304
CMDS1JF	NEVTEL	7567	313
CMDS1JH	DELTACOM	7727	377
CMDS1JK	NEXTLINK	7344	52
CMDS1JP	MFS	7132	113
CMDS1JQ	KMC	7581	240
CMDS1JR	S. E. TELEPHONE	7514	369
CMDS1JV	ALEC, INC.	7017	300
CMDS1JW	AMERICAN METROCOM	7841	399
CMDS1JX	SHELL OFFSHORE	7023	373
CMDS1J1	TIME WARNER COMM	7178	482

JACKSONVILLE

Dataset Node	Company	OCN	
CMDS1JD	AT&T	7421	119
CMDS1JE	USLEC	7674	274
CMDS1JI	INTERMEDIA	7149	199
CMDS1JN	NATIONAL	7318	181
CMDS1JO	ORLANDO BUS SYS	7857	364
CMDS1JY	FIBERSOUTH COMM	7342	598
CMDS1JZ	BTI	7795	599
CMDS1JJ	CONCORD TEL EXCHG	7002	480

CHARLOTTE

Dataset Node	Company	OCN	
CMDS1JS	SPRINT METRO	7391	61
CMDS1JT	MCI METRO	7229	115

REQUEST: Please state whether BellSouth is planning to replace its existing service ordering systems for business customers (i.e., DOE and SONGS). If the answer if affirmative, please:

(a) state when is BellSouth planning or replace DOE, SONGS, or both;
(b) describe the technology that BellSouth will use in its replacement systems;
(c) describe the functional improvements over DOE and SONGS that BellSouth expects to achieve through its replacement system;
(d) state whether BellSouth will provide equivalent improvement to OSS interfaces used by CLECs and describe how BellSouth will improve each particular interface.

RESPONSE: (a) BellSouth currently estimates that a system, which *may* replace DOE and SONGS, will be implemented in late 1998 or early 1999.

(b) BellSouth objects to this item on the grounds that the information requested is proprietary and/or a trade secret.

(c) This system, which *may* replace DOE and SONGS, will be a business marketing and sales negotiation tool business customers for the entire BellSouth region in contrast with DOE, which is used in Florida, Georgia, North Carolina, and South Carolina, and SONGS, which is used in Alabama, Kentucky, Louisiana Mississippi, and Tennessee.

(d) CLECs already have regional interfaces. Of course, BellSouth will continue to provide enhancements to these already non-discriminatory CLEC interfaces, just as it enhances its own systems.

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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