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Guy M. Hicks
General Counsel

March 13, 1997

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 second set of data requests of AT&T. A copy has been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

Enclosure

REQUEST: Describe the monthly retail flow-through rate for:

a) BellSouth's residence orders;

b) BellSouth's business orders;

c) BellSouth's residence and business orders combined.

RESPONSE:

a) The % flow-through of all orders processed through the RNS Operations Support System for residence orders

b) The % flow-through of all orders processed through DOE and SONGS Operations Support Systems for business orders.

c) A statistical average of a & b above.

REQUEST: Identify in detail the basis for BellSouth's statement, in its response to Item No. 3 of the Data Requests of the Consumer Advocate Division ("CAD"), that the adjusted flow-through rate for CLECs for January 1998 is "comparable to the combined retail flow-through rates for residence and business orders." Your answer should include, but is not limited to, a description (in percentages) of the specific "combined retail flow-through rates" to which BellSouth refers.

RESPONSE: The January 1998 adjusted flow-through rate for CLECs was 90.5% compared to the combined retail flow-through rate for BellSouth's residence and business orders of 83.4%. This reflects a mere 7.3% deviation between the two rates in favor of the CLECs.

REQUEST: With respect to the monthly flow-through reports that BellSouth provided in response to the data requests of AT&T and the CAD (see, e.g., BellSouth Electronic Interface Flow-Through Report for period 1/01/98 to 01/30/98):

a) Identify the particular errors that BellSouth regarded as "CLEC errors" or "CLEC SOER errors" for purpose of the reports;

b) Identify the particular errors that BellSouth regarded as BellSouth errors ("BST errors") for purpose of the reports;

c) Describe the criteria, guidelines, or methodology that BellSouth used to determine whether a particular error that prevented an order from flowing through was a CLEC error, as opposed to a BST error (or vice versa).

RESPONSE: a) See attached documents.

b) See attached documents.

c) The criteria for determining the nature of the errors is based on whether the error is a CLEC input error or if the error was caused by a BellSouth system and/or process.

REQUEST: With respect to the BellSouth Electronic Interface Flow-Through Report for the reporting period January 1, 1998 - January 31, 1998:

a) Identify the CLECs listed as companies "L" and "P" (which are described as having non-adjusted flow-through rates of 98.0% and 96.1%, respectively);

b) Describe the types of orders submitted by CLEC "L" during the month of January (such as migration as is), and the number of orders within each type;

c) Describe the types of orders submitted by CLEC "P" during the month of January (such as migration as is), and the number of orders with each type.

RESPONSE: a) BellSouth objects to this request on grounds that it seeks CLEC proprietary information.

b) BellSouth objects to this request to the extent it seeks CLEC proprietary information. Subject to this objection, and without waiving this objection, CLEC "L" is submitting new installation orders and switch-as is orders. In January 1998, CLEC "L" submitted 655 LESOG eligible orders.

c) BellSouth objects to this request to the extent it seeks CLEC proprietary information. Subject to this objection, and without waiving this objection, CLEC "P" is submitting new installation and switch-as is orders. In January 1998, CLEC "P" submitted 330 LESOG eligible orders.

REQUEST: With the respect to the volume tests that BellSouth performed on its Local Exchange Ordering and Pre-Ordering Gateway system on January 15, 1998:

a) Describe in detail any file space problems on the BellCore simulator server that occurred during the tests, including but not limited to a description of the nature of the problems, the time when the problems first began to occur, and the time when the problems ended;

b) Describe any other problems that occurred during the tests.

RESPONSE: a) The Bellcore simulator input order and pre-order transactions into LENS from 4:00 AM until shortly after 12:00 AM. (BellSouth testers were monitoring LENS logs throughout the test.) During most of that time (4:00 AM - 18:00 PM), the server was logging results, which were subsequently sent to the BellSouth test team for use in documenting results. At approximately 18:00 PM, the Bellcore server ran out of log file space and discontinued logging results, although transactions continued to process normally. The Bellcore logs, however, were not needed to substantiate the fact that the targeted number of orders and pre-orders were processed through LENS during the run. The exact order count that was processed successfully via LENS during the 20 hours was captured in the Local Exchange Ordering (LEO) database, which maintains a status of all CLEC orders. The target volume of pre-order activity (40,000 transactions) was exceeded before the Bellcore server discontinued logging.

RESPONSE (cont'd):

b) The FOC count during the run was slightly lower than it should have been as a result of the way transaction resends had to be handled in the testbed version of the Service Order Control System (SOCS). At one point during the test, SOCS experienced temporary problems trying to send service order status information back to LEO to be used to generate FOCs and completions. In production, this data would have been resent automatically via regularly scheduled batch jobs in SOCS. These batch jobs are not scheduled to run automatically in the test environment, however. This situation was not recognized immediately during the test. Once it was recognized, the resend job was kicked off manually and SOCS immediately sent back status information on each of the orders that was impacted by the transmission problem. However, some of the affected orders were marked as "completed" in SOCS before the resend of the FOC status was done. Since SOCS always sends only the latest status of an order, no FOC was generated for these orders. In each case, however, a completion notice was generated.

REQUEST: Identify the additional costs that, by BellSouth's calculation or estimate, BellSouth would be required to incur if it was required to add the capability in its central offices to capture usage data for flat rate calls. Your response should include, but is not limited to, a description of the basis for the calculation or estimate provided.

RESPONSE: The issue is not the additional costs that would be required to capture flat rate local usage in BellSouth's central offices in Tennessee, as most of BellSouth's switches in Tennessee presently have this capability. However, in order to provide CLECs with usage data on flat rate calls, CLECs call records must be sorted from those of BellSouth and all other CLECs. There are two ways to accomplish this. The first method is for the switch to provide information that would tag each record by CLEC. The industry is in the infancy stages of creating such an indicator. The time needed to complete the specifications for this enhanced capability and the time needed to implement it in all BellSouth switches makes this a long term project. The second method is for these records to be processed in BellSouth's billing system. The system would find the appropriate billing account for each record and tag each with information that would identify the CLEC whose end user made the call. BellSouth has estimated that the cost to provide the system processing capability to handle this volume of data is approximately $7 million to $10 million and includes the cost of both hardware and software revisions and enhancements.

REQUEST: Does BellSouth make systems such as CommTech's MACSTAR or BellCore's CCRS available to its CENTREX (or equivalent service) customers?

RESPONSE: Yes. CommTech's Macstar station administration product is available to BellSouth's Centrex-like customers who are served by the EWSD switch. BellCore's CCRS station administration product is available to BellSouth's Centrex like customers who are served by the 1AESS, DMS-100 or 5ESS switch types.

REQUEST: If the answer to question 7 is "yes," do these systems give BellSouth's CENTREX (or equivalent service) customers capability to perform recent changes that affect the CENTREX (or equivalent service) customers' lines?

RESPONSE: Yes. The Macstar and CCRS station administration platforms both allow the Centrex-like customer to perform recent changes on certain designated switch features and/or switch functionality on lines which the customer requests station management capability.

REQUEST: If the answer to question 8 is "no," explain how a CENTREX (or equivalent service) customer can (a) add a line, (b) add a feature, or (c) suspend service on a line.

RESPONSE: See response to Second Data Request No. 8.

REQUEST: Can a CENTREX (or equivalent service) customer affect a recent change for lines other than those dedicated to its use? If so, how?

RESPONSE: No.

REQUEST: In the majority of cases in which a residential POTS customer with analog service discontinues service because he or she has moved, does BellSouth physically remove any facilities (e.g., cross-connections) in order to disconnect the service? If so, the physical work done solely to accomplish disconnection, or is it performed to accomplish some other task?

RESPONSE: No.

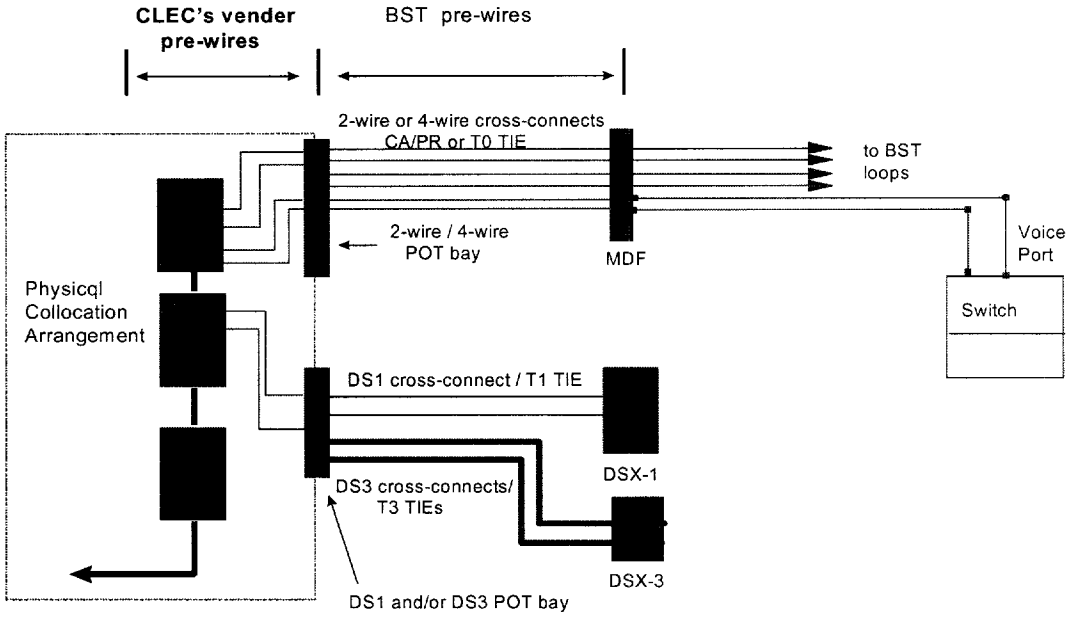
REQUEST: In an average large central office in a large metropolitan area in BellSouth's region, approximately how many PIC changes are performed in a given day?

RESPONSE: This information is not reported at a central office level. However, in 1997 there were 1.3 million PIC changes in the state of Tennessee.

REQUEST: Under BellSouth's proposal to recombine the loop and switch through collocation, what if any pre-wiring by CLECs will BellSouth permit at 1) the main distribution frame ("MDF"); the CLEC's collocated space?

RESPONSE: A CLEC can arrange the pre-wiring of its collocated equipment within the collocated space and the terminations between the collocated equipment and the point of termination bay (POT bay) which serves as the demarcation point. BellSouth pre-wires terminations on the main distribution frame (MDF). These pre-wired terminations extend from the MDF to the physical collocation demarcation POT bay. BellSouth provides the cable and pair facility names of these terminations to the collocator prior to the completion of the collocator's equipment installation so the collocator may specify the cable and pair facility to be used when unbundled elements are ordered to the collocation arrangement. Neither a CLEC nor the CLEC's vendor is permitted to pre-wire terminations directly on the main distribution frame.

Example Physical Collocation schematic



POT Point of Termination
MDF Main Distributing Frame

REQUEST: Where CLECs request collocated space solely for the purpose of loop/switch recombination, will BellSouth require use of an IDF?

RESPONSE: BellSouth does require CLECs to use any specific type of equipment for recombining elements within their collocation space.

REQUEST: What is the longest service outage a customer has experienced during conversion of a BellSouth customer to a UNE CLEC customer during the last six months?

RESPONSE: BellSouth does not track the information requested.

REQUEST: What is the "incremental charge" that a CLEC ordering a Service Level One loop must pay to obtain a coordinated cutover of service, as described in BellSouth's Unbundled Loop Interdepartmental Service Description, p. 9 (attachment WKM-9 to Milner Aff. in FCC CC Docket No. 97-231)?

RESPONSE: "Order Coordination" is an optional item on Service Level One (SL1) voice loops and is utilized when the requesting CLEC wishes to minimize the time the end user is without dial-tone. If the CLEC requests a SL1 loop with Order Coordination, the circuit will be provisioned using a coordinated conversion schedule that disconnects the existing loop, cross-connects the new loop to the CLEC's collocation space, and translates any required number portability features within a 5 to 15 minute window. The charge for Order Coordination will be established by the TRA in Docket 97-01262.

REQUEST: What are the total charges that a CLEC must pay when ordering a Service Level One loop such that the loop would not be out of service for more than 5 minutes?

RESPONSE: In addition to the loop itself, the only other charge needed to convert an existing circuit to an Unbundled Voice Loop - SL1 (within a 5 to 15 minute window) is the Order Coordination charge described in Second Data Request No. 16.

REQUEST: Which components of BellSouth's network in Tennessee have been combined from remote locations using the cross-connect systems described in response to Item No. 34 of AT&T's First Data Request?

RESPONSE: As described in the response to First Data Request No. 34, various facilities, ports and trunk units have the capability for electronic cross connection depending on equipment deployment and service design.

REQUEST: Does BellSouth plan to undertake or commission any testing or studies concerning expected or actual duration of service outages for conversion of existing BellSouth customer to UNE-combination CLEC customers? If so, how and when will the testing or studies be conducted?

RESPONSE: If this request refers to CLEC controlled UNE-combination, then the CLEC is responsible for the combining process. BellSouth presently has no plans to undertake or commission any test or studies specific to duration of service related to unbundled network elements that may be combined by a CLEC.

However, BellSouth is engaged with AT&T to undertake joint testing of certain UNE-combination processes. The tentative start date for this cooperative test plan is April 1, 1998. This joint test should provide an adaquate study as to the total process for these specific UNE-combinations.

REQUEST: Does BellSouth plan to undertake or commission any testing or studies concerning the number of loop/switch combination orders that BellSouth could provision in a single central office per day? If so, how and when will the testing or studies be conducted?

RESPONSE: No.

REQUEST: What is a) the longest interval to which BellSouth has committed for the provision of collocated space; and b) what is the shortest interval to which BellSouth has committed for the provision of collocated space?

RESPONSE: See BellSouth's response to NEXTLINK's Second Data Requests Nos. 57-59.

REQUEST: Does BellSouth plan to undertake or commission any testing or studies to determine whether it can meet its committed intervals for provision of collocated space? If so, how and when will the testing or studies be conducted?

RESPONSE: BellSouth negotiates and commits to provisioning intervals specific to each collocation arrangement installation which fall within the parameters of contract or regulator specified intervals. BellSouth is continually monitoring its performance and revising processes as necessary to ensure BellSouth can meet its commitments.

REQUEST: May CLECs purchase at a UNE price interoffice transport shared with BellSouth?

RESPONSE: Yes. BellSouth offers common transport at UNE prices. Common transport for CLECs is routed over the same facilities as BellSouth traffic.

REQUEST: Will BellSouth require CLECs to recombine signaling and switching? If so, describe BellSouth's proposal.

RESPONSE: No. When the CLEC purchase a switch port at UNE prices, access to both switching and signaling is inherent in the switch port. Per minute usage charges would apply.

REQUEST: Will BellSouth require CLECs to recombine switching and interoffice transport? If so, describe BellSouth's proposal.

RESPONSE: No. BellSouth offers to combine switching and common transport for the CLEC. This is the only way common transport can be provided.

REQUEST: Will BellSouth require CLECs to recombine signaling and databases? If so, describe BellSouth's proposal.

RESPONSE: No. When CLECs purchase signaling and access to databases at UNE prices, there is nothing to recombine.

REQUEST: Will BellSouth require CLECs to recombine switching and databases? If so, describe BellSouth's proposal.

RESPONSE: No. When CLECs purchase switching and access to databases at UNE prices, there is nothing to recombine.

REQUEST: Will BellSouth require CLECs to recombine switching and OSS? If so, describe BellSouth's proposal.

RESPONSE: BellSouth objects to this request on grounds that it is overly vague. BellSouth is unsure to what AT&T is referring when it uses the term "OSS" in this context.

REQUEST: Will BellSouth require CLECs to recombine switching and OS/DA? If so, describe BellSouth's proposal.

RESPONSE: No. When CLECs purchase the switch port at UNE prices, access to OS/DA is included.

REQUEST: Has BellSouth revised its methods and procedures for provisioning unbundled network elements, collocated space or local number portability as the result of discussions with or issues raised by NextLink? If the answer is affirmative, please specify such discussions and provide any supporting documentation.

RESPONSE: No.

REQUEST: Is BellSouth currently providing such data as described in Document Requests 11 and 12 of AT&T's Second Set of Data Requests to any CLEC, either in the context of testing or in the context of live traffic? If not, why not?

RESPONSE: Document Request No. 11 asks for evidence of BellSouth's ability to provide electronic billing to CLECs for Unbundled Network Elements (UNEs).

BellSouth uses both the Customer Records Information System (CRIS) and the Carrier Access Billing System (CABS) to bill CLECs for UNEs. For UNEs that alrady have existing industry billing standards (such as designed unbundled loops), BellSouth provides for electronic billing via CABS in a production (non-test) environment. Electronic billing is available for these UNEs as well as other services billed through CABS.

For other types of UNEs (unbundled local switching, for instance), the Ordering and Billing Forum (OBF) is still in the process of desiging billing standards. BellSouth will take the additional step to use the industry developed standards designed for resale services to electronically bill for these UNE's until the OBF has completed its work. This capability will be in production (non-test) environment by mid-May, 1998.

Document Request No. 12 speaks to BellSouth's capability to provide CLECs with records to enable it to bill Interexchange Carriers (IXCs) for originating and terminating access. As of December 19, 1997, BellSouth has had the capability in a production (non-test) environment to provide this information to CLECs. BellSouth provides this information via the Access Daily Usage File. To date, one CLEC has contracted for this capability. A first file has been provided to this CLEC for their

RESPONSE (cont'd):

use in testing their systems. The file contained records for all of the appropriate traffic that has originated from or terminated to any unbundled port which has been ordered by the CLEC in a number of states. Attachment 1 contains a report which specifies the total number of records provided to this CLEC.

BellSouth Telecommunications, Inc.
TRA Docket 97-00309
AT&T's Second Data Requests
March 6, 1998
Item No. 31
Attachment 1

Access Daily Usage Records Sent to CLECs

From BellSouth RAO	To OCN	Invoice	Records Out
044	7421	01	431
048	7421	01	136
056	7421	01	03
Totals			575

REQUEST: Has BellSouth revised its methods and procedures for provisioning unbundled network elements and collocated space as a result of discussions with, or issues raised by, NextLink referenced in the October 28, 1997 letter from Charles Howorth of BellSouth to Don Hillenmeyer of NextLink produced by BellSouth in response to AT&T Document Request No. 31 in AT&T's First Set of Data Requests?

RESPONSE: No.

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 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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