BOULT
CUMMINGS
CONNERS
& BERRY PLC

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

Jon E. Hastings
(615) 252-2306
Fax: (615) 252-6306
Email: jhasting@bccb.com

TELEPHONE (615) 244-2582
FACSIMILE (615) 252-2380
INTERNET WEB http://www.bccb.com/

March 17, 1998

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

In 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 David:

Enclosed please find an original and thirteen (13) copies of MCI Telecommunications Corporation's and MCImetro Access Transmission Services, Inc.'s **NON-PROPRIETARY** data responses to the Consumer Advocate's First Discovery Request. Copies will be served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

Jon E. Hastings

JEH/sja
Enclosures

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BEFORE THE TENNESSEE REGULATORY AUTHORITY

In 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

RESPONSES OF MCI TELECOMMUNICATIONS CORPORATION AND MCIMETRO ACCESS TRANSMISSION SERVICES, INC. TO THE CONSUMER ADVOCATE DIVISION'S SECOND DISCOVERY REQUEST

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, "MCI") respond to the Consumer Advocate's First Discovery Request as follows:

GENERAL OBJECTIONS

1. MCImetro objects to the First Discovery Request to the extent it seeks information protected by the attorney-client privilege.

2. MCImetro objects to the First Discovery Request to the extent it seeks information that is protected by the work product doctrine.

RESPONSES

1. For each service area in Tennessee identify:

   a. the number of residential customers served by the company's own facilities.

   b. the number of residential customers served by resale of BellSouth service.

   c. the number of residential customers service by use of BellSouth unbundled network.

   d. the number of business customers served by the company's own facilities.

   e. the number of business customers served by resale of BellSouth service.

f. the number of business customers service by use of BellSouth unbundled network elements.

RESPONSE: MCI has provided the requested information in the proprietary version of its Responses to Consumer Advocate's First Discovery Request.

2. Provide any analysis in AT&T's possession of time laps between the AT&T's submission of orders to BellSouth Telecommunications, Inc. and the time that AT&T was notified of errors in such orders. If data is available, identify the time laps for orders involving AT&T's provision of service by:

(i) AT&T's use of BellSouth's unbundled network elements,

(ii) use of AT&T's own facilities, and

(iii) AT&T's resale of BellSouth's service.

RESPONSE: MCI states that during operational trials conducted in Atlanta in the summer and fall of 1997 involving resale orders to BellSouth, MCI received seventy-one reject notices. On average those notices were received three days after the orders were submitted.

3. Provide copies of any analysis, reports, and/or correspondence provided to AT&T by BellSouth concerning the number and type of error made by AT&T employees that resulted in rejection of the AT&T's orders.

RESPONSE: Other than rejection notifications received in response to particular trial resale orders (which MCI does not consider responsive to Discovery Request No. 3), BellSouth has not provided MCI with any such analysis, report or correspondence.

4. In response to Item 11 of the Consumer Advocate Division's first discovery request BellSouth responded in part:

> Once an order is pending in the Service Order Control System (SOCS), certain situations can arise that result in a "jeopardy"

condition. A jeopardy occurs when it appears that the previously established due date for the order may not or will not be met. Jeopardy notifications, often called "jeopardies," therefore advise CLECs when an order is not expected to be completed by the due date. BellSouth currently notifies CLECs of service jeopardies primarily by telephone, and less frequently, by facsimile, which is substantially the same time and manner it does for itself.

a. Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide any available documentation to support you position.

RESPONSE: MCI does not agree with BellSouth's contention that it provides service jeopardies to CLECs in substantially the same time and manner as it does for itself. BellSouth obtains a substantial amount of jeopardy information by automated means. BellSouth provides notice of service jeopardies to its customer representatives who call BellSouth's customers, and to other representatives who call CLECs. CLECs thus cannot relay jeopardy notifications to their customers as rapidly and efficiently as BellSouth. The relevant comparison is what BellSouth provides to CLECS versus what it provides to itself, not versus what BellSouth provides to its customers. This problem is made worse because CLECs are unable to track orders once they have been submitted. BellSouth's policy is to continue working on an order as long as possible and not to give notice of a problem to a CLEC until it becomes clear that the order cannot be installed on time. Such notice usually is given on the day the order is scheduled to be installed.

b. Provide copies of all analysis in AT&T's possession concerning the number of or per cent of times BellSouth meets and the number of or per cent of times BellSouth fails to meet the initial established due date. If available provide the breakdown as following service categories.

(i) AT&T's use of BellSouth's unbundled network elements,

(ii) use of AT&T's own facilities, and

(iii) AT&T' s resale of BellSouth's service.

RESPONSE: MCI object to Discovery Request No. 4(b.) because it is unreasonable to require MCI to provide all of the requested data given the short time for response. Subject to the objection, MCI will produce a copy of the last report it prepared concerning the operational trials conducted in Atlanta in the summer and fall of 1997, and also will produce national test data relating to Tennessee.

5. Provide all analysis in AT&T's possession concerning the amount of time that AT&T's customers are out of service during cut over from BellSouth, where service is being furnished by:

(i) AT&T's use of BellSouth's unbundled network elements,

(ii) use of AT&T's own facilities, and

(iii) AT&T's resale of BellSouth's service.

RESPONSE: Based on reasonable inquiry, MCI has no such analysis in its possession.

6. In response to the Consumer Advocate's First Discover Request Item 3, BellSouth responded:

> See Response to Item 2. BellSouth reiterates that it has supplied information regarding submission of orders via the EDI interface in the Local Exchange Order (LEO) Guidelines. The current edition has been available to CLECs for at least 6 months, but the first edition was made available in April, 1997. The LEO Guide was attached to the Direct Testimony of Gloria Calhoun as Exhibit GC-26 and to the Affidavit of William Stacy as Exhibit WNS-45. While BellSouth had previously provided much of this information (most of it is contained in the LEO Guide), on January 30, 1998, a comprehensive package of edits (including the Local Exchange Ordering (LEO) and Local Exchange Service Order Generator (LESOG) edits and Rejects

requirements, and a disk of the Service Order Edit Routine (SOER) edits used by the Service Order Control System (SOCS) was delivered to CLECs and notice of the availability of these edits was put on BellSouth's CLEC web site.

Regarding the subject of "flow-through," attached is the January flow-through report. This report shows the flow-through rate of all CLECs using LENS or EDI for electronic ordering for the month of January 1998. "Raw flow-through" includes orders rejected for errors, man of which are CLEC input errors.

"Adjusted flow-through" excluded rejected orders, and shows what the systems are capable of flowing through mechanically. Also attached are CLEC order errors analyses, showing the types of order errors observed during an examination of every electronic order placed for three days in November and September.

The January flow-through report shows that two CLECs, CLECs L and P, which placed 659 and 332 orders respectively electronically in January alone, achieved non-adjusted flow-through rates of 98.0% and 96.1%, showing that high flow-through with trained service representatives is indeed quite possible using the electronic interfaces BellSouth provides for CLECs. This report's results indicate that January's raw, non-adjusted flow-through rate was 63.3%, a 150% improvement over July's raw flow-through rate of 25%. When January's 63.6% raw flow-through is adjusted for the CLEC-caused order errors, which were 80.1%, the adjusted flow-through rate for January is 90.5%. This rate is comparable to the combined retail flow-through rates for residence and business orders.

The second set of documents attached in response to this Request reflect that BellSouth conducted analyses of order flow-through and error which caused orders to be rejected taking a sample of all electronic orders placed during 1

day in September and 2 days in November, to examine each order to determine which errors are indeed CLEC order errors and BellSouth's system errors. The report validate that CLECs' order error rates ranged from 27% to 88%, also indicating that lower error rates are indeed achievable November's analysis of electronic order errors shows that SOER (edits used by SOCS) errors accounted for 45% of the CLECs' errors. These SOER errors include many omitted or incorrect USOCs on the service order. This is in spite of the fact that BellSouth has provided CLECs the required USOCs in the Local Exchange Ordering Guide, Volumes 2 and 3, which CLECs have had since April, 1997, and again in BellSouth's CLEC web site. Another error is improper formatting of data on the service order (no space after a comma, for example). As stated earlier, this information also was provided in the three-volume Local Exchange Ordering Guide. The second largest CLEC error category was address errors, which accounted for 26.7% of the CLEC errors. BellSouth has provided CLECs the information they need to perform correct order processing, ad demonstrated by the two CLECs mentioned earlier, who are achieving non-adjusted flow-through rates of 98% and 96%.

BellSouth also provide ongoing assistance to CLECs to help them decrease their order errors and rejects, and therefore increase their order flow-through. BellSouth continues to conduct regularly scheduled training classes on the Electronic Interfaces - BellSouth trained 383 CLEC attendees in 1997's Electronic Interfaces classes. In addition to the documentation previously listed, BellSouth has provided the LENS User Guide, the Trouble Analysis Facilitation Interface (TAFI) User Guide, the EDI-PC Harbinger Training Manual, as well as specifications for CGI-LENS and TAFI. BellSouth also provides a team of people who chan provide on-site assistance to CLECs upon request (at their locations), to help them with their use and understanding of the Electronic

Interfaces. Finally, BellSouth has provided to the CLECs electronic assess to USOCs, as well as the Rejects Requirements binder developed by BellSouth and agreed upon by the CLEC EDI users.

a. Does AT&T agree with BellSouth's response? If not explain. Please be specific and provide supporting documentation.

RESPONSE: (a) MCI disagrees with several of the statements made by BellSouth. For example, MCI disagrees with any suggestion by BellSouth that the Local Exchange Order ("LEO") Guide contains complete and accurate information on order submission. In fact, MCI has discovered and presented to BellSouth several examples of incorrect or incomplete information in the LEO guide. These deficiencies have caused MCI to waste resources coding to incomplete or outdated information. It also should be noted that BellSouth has been slow to update the LEO guide and publish the updates. For example, CLECs did not receive updates to the April 1997 LEO guide until September 1997, and this revised LEO guide was dated July 1997. Further, CLECs desiring to migrate to the most recent version of EDI (Issue 7) after the March 16, 1998 cut over date had to request advance draft copies of the LEO guide so they could begin the development process.

The more than 2500 pages of Service Order Edit Routine ("SOER") edits recently provided by BellSouth are of no practical use to CLECs. These edits do not explain to CLECs how to submit an order that will be accepted by BellSouth, but rather provide an unworkably long list of reject reasons that will result from orders submitted with errors. These SOER edits do not provide the business rules that will allow a CLEC to issue the orders correctly the first time.

BellSouth's flow-through figures are questionable because BellSouth adjusts the data using an undescribed methodology based on its perception of which errors in the ordering process were caused by CLECs. For this reason, the FCC has rejected BellSouth's argument that it should

be allowed to rely on its adjusted flow-through figures. In re Application of BellSouth Corporation Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208, December 24, 1997, ¶ 108. Moreover, two of the most common errors, omitted or incorrect USOCs and invalid address, reflect BellSouth's refusal to enable CLECs to integrate key pre-ordering information into their systems. MCI has requested BellSouth to provide an electronic download of the USOC file several times, but BellSouth has refused to provide it. Instead, MCI and other CLECs must rely on USOC information in the LEO guide or on a WEB site, which contain inaccurate USOC information and are not updated often enough to keep up with frequent USOC changes. In addition, neither of the methods of providing USOCs allows CLECs to integrate the USOC information into their systems. Likewise, BellSouth refuses to provide a download of its RSAG database so that CLECs can integrate address validation information into their pre-ordering systems.

7. In response to Consumer Advocate Division first discovery request Item 6(First), BellSouth responded:

> The CLECs have requested that notification of rejected orders be delivered to them via EDI, and BellSouth began implementing electronic notification in November 1997, as described below. There currently are no industry standards for providing electronic reject or error notification. BellSouth's current EDI implementation complies with the national standards established by the industry's Ordering and Billing Forum in TCIF version 6.0. However, neither this version -- nor version 7.0, which is scheduled to be implemented on March 16, 1998 -- provides standards for returning information to the CLEC for orders rejected because of errors detected by LEO, LESOG, or SOCS. Despite the lack of industry standards, BellSouth has already developed and implemented the first of a two-stage process to

> provide error rejection electronically. This mechanism returns an error code and an explanation of the error to CLECs using the EDI interface. This initial stage of this automated reject capability, which was tested by MCI, became operational in November 1997. This stage contains 68 percent of the total electronic rejects to be implemented. The remaining error types are being addressed in the second phase of this implementation. To facility this development in the absence of industry standards, BellSouth hosted a conference on October 30 and 31, 1997 for all CLECs using EDI. This conference was necessary because of the nature of EDI, which requires complementary programming on both BellSouth's and the CLECs' side of the EDI interface. The CLECs and BellSouth agreed on the specifications required for the remaining capability which all parties would implement on their respective sides of the EDI interface. The second phase of the reject capability is currently schedule to be operational on March 16, 1998. Until the second phase is implemented, rejects not included in the 68 percent of error types currently handled by EDI are routed to the Local Carrier Service Center, where they can be corrected by the LCSC or faxed to the CLECs if necessary .....

a. Has AT&T agreed to the specifications required for the remaining capability will implement on their respective sides of the EDI interface.

RESPONSE: BellSouth's statement that it agreed with CLECs on October 30 and 31 concerning the specifications for electronic rejects is misleading. BellSouth discussed the specifications at the meeting without prior notice, and BellSouth did not provide the specifications at the meeting. MCI requested the specifications after the meeting and agreed to them after reviewing them because BellSouth stated at the meeting that unless CLECs were prepared to test the

specifications by a certain date, they would not have the desired rejection functionality available until EDI 7.0 was implemented.

b. Has AT&T tested the initial stage?

RESPONSE: BellSouth required all CLECs to enter into testing if they desired to receive interim rejects. MCI agreed to test interim rejects in November and December 1997. The testing of interim rejects was not successfully completed because BellSouth had problems entering the test cases it created into its EDI application. BellSouth's system edits would not allow the interim reject test cases to flow through for processing.

c. If AT&T is using this initial stage, give the date that AT&T's use began.

RESPONSE: Not applicable.

d. If AT&T is not using the initial stage, please explain.

RESPONSE: MCI is not using the initial stage of mechanized rejects because EDI Issue 6.2 was not implemented.

e. Does AT&T plan to begin using the final stage on March 16, 1998? If not please explain.

RESPONSE: MCI has provided the requested information in the proprietary version of its Responses to Consumer Advocate's First Discovery Request.

f. Please identify any statements made by BellSouth in this response with which AT&T disagrees.

RESPONSE: Statements with which MCI disagrees are discussed above in response to subparts (a.)-(e.).

8. In response to Item 7 of the Consumer Advocate Division's first discovery request BellSouth stated:

(a) BellSouth object to this request as phrased. BellSouth does not believe there are any deficiencies. Subject to this objection, BellSouth has and does provide CLECs with mechanized firm order confirmations (FOCs), but it **does not** have a corresponding process for its own retail operations. An FOC is the CLEC's assurance that its order has successfully passed through the various edits and formatting checks in LEO, LESOG, and SOCs, and that the order is pending in SOCS. A completion notice (CN) is provided to a CLEC after a service order has been posted as "complete" in SOCS. BellSouth **does not** have a corresponding process for itself. For information regarding rejection and jeopardy notification, please see BellSouth's response to Data Request nos. 5, 6 (First), 10, and 11. Also see BellSouth's response to nos. 8, 9, 12, and 13. (Emphasis provided.)

a. Does AT&T agree with BellSouth's response? If not, please explain. Please be specific and provide as supporting documentation.

RESPONSE: MCI does not agree with BellSouth's response. BellSouth representatives are notified through RNS and DOE that an order has been accepted, which means that the order is error free and that the requested due date is valid. This notification is the equivalent of an FOC received by a CLEC. Further, BellSouth does not provide completion notifications to CLECs for all orders; for example, BellSouth does not provide such notice for orders submitted via an access service request and orders for unbundled loops with local number portability. Finally, BellSouth does receive completion notification in at least some cases. For example, BellSouth is notified when installations requiring a premise visit are complete by technicians who typically transmit the information using portable terminals.

9. In response to Item 15 of the Consumer Advocate Division's first discovery request BellSouth stated:

In response to Item no. 14, BellSouth admitted that it does not integrate the LENS pre-ordering and the EDI ordering interfaces for CLECs. Integration of the pre-ordering interfaces is the responsibility of each CLEC, if it desires integration; it is not BellSouth's responsibility. However, since the time of the Louisiana filing, and updated GCI specification for LENS has been made available to interested CLECs. The EC-LITE machine-to-machine pre-ordering interface, which may also be integrated with EDI, became available on December 31, 1997.

a. Does AT&T agree with this response? If not, please explain. Please be specific and provide supporting documentation.

RESPONSE: MCI does not agree that the CGI or EC-LITE interfaces permit CLECs to integrate the ordering and pre-ordering functions. MCI requested the Common Gateway Interface ("CGI") specifications so that it could, as an interim measure, develop an enhanced "screen scraping" capability for customer service records ("CSRs") using the LENS interface. CGI does not represent a long-term solution because CLECs using that interface still will be dependent on LENS and limited by its many deficiencies. When BellSouth finally provided updated CGI specifications on December 15, 1997, they were incomplete. MCI's information technology staff has reviewed the specifications and determined that they lack a CSR record layout and a LENS data dictionary. The specifications do contain some of the information that typically would be found in a CSR record layout and data dictionary, but that information is insufficient for MCI's development purposes.

The CSR record layout is a visual representation of the physical layout of the data contained in a CSR. Usually the CSR record layout is a picture that describes all the field names, field labels, field lengths and their positioning when displayed on a computer screen or when printed on paper. It also describes the positioning of all the fields relative to one another. The data dictionary is a dictionary of all the data elements contained in CSRs provided by LENS as well as

all the data elements used to develop the LENS application. A data dictionary is a document presented in a dictionary style, in alphabetical order, beginning with the data element (or term) and followed by its definition including the type of data (such as integer, alpha, string or decimal), attributes, parameters, location within the application, exception rules and examples of usage.

MCI's information technology staff has determined that it needs the CSR record layout and LENS data dictionary to retrieve CSRs on an automated basis. Otherwise, MCI will waste time and resources attempting to determine what data it is obtaining from LENS and how that data should be interpreted.

BellSouth's reliance on EC-LITE also is misplaced. EC-LITE was developed by BellSouth specifically for AT&T. EC-LITE is not a standard interface and was voted down by the Electronic Communication Interface Committee ("ECIC"). It would take MCI six to nine months and many millions of dollars to develop the ability to implement this interface, which is not and has no reasonable prospect of becoming the industry standard.

b. Has AT&T integration of its pre-ordering interfaces? If not, please explain.

RESPONSE: MCI does not have integrated pre-ordering and ordering functions. MCI either obtains pre-ordering information manually or through the LENS interface, neither of which are integrated with the EDI ordering interface that MCI intends to use.

10. Provide any analysis of the length of time between being notified by BellSouth that it will not be able to accomplish the cut over and the scheduled cut over date.

RESPONSE: Based on reasonable inquiry, MCI states that it has not performed such an analysis.

11. Provide any analysis that shows the number of times/frequency of customers service being disconnected by BellSouth and you not being able to provide service to the customer due to BellSouth's problems. (Provide supporting documentation.)

RESPONSE: Based on reasonable inquiry, MCI states that it has not performed such an analysis.

Respectfully submitted,

Jon E. Hastings
Boult, Cummings, Conners & Berry
Suite 1600, 414 Union Street
Nashville, Tennessee 37219-1777
(615) 252-2306
BPR # 10470

Susan Berlin
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, Georgia 30342
(404) 267-6375

Attorneys for MCI Telecommunications Corporation

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on this the17th day of March, 1998:

Guy M. Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Dennis McNamee, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

Dana Shaffer, Esq.
NextLink
105 Molloy Street, #300
Nashville, TN 37201

H. LaDon Baltimore, Esq.
Farrar & Bates
211 Seventh Ave. No., #320
Nashville, TN 37219-1823

Charles B. Welch, Esq.
Farris, Mathews, et al.
511 Union Street, #2400
Nashville, TN 37219

Val Sanford, Esq.
Gullett, Sanford, et al.
230 Fourth Ave. N., 3rd Floor
Nashville, TN 37219-8888

L. Vincent Williams, Esq.
Consumer Advocate Division
426 5th Avenue, N., 2nd Floor
Nashville, TN 37243

Thomas E. Allen
Intermedia Communications
3625 Queen Palm Drive
Tampa, FL 33619

Carolyn Tatum Roddy, Esq.
Sprint Communications
3100 Cumberland Circle, N0802
Atlanta, GA 30339

Guilford Thornton, Esq.
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219

D. Billye Sanders, Esq.
Waller, Lansden, Dortch & Davis
511 Union Street, #2100
Nashville, TN 37219-1750

Henry Walker, Esq.
Boult, Cummings, Conners & Berry PLC
414 Union Street, Suite 1600
Nashville, TN 37219

Enrico C. Soriano
Kelley, Drye & Warren
1200 19th St., NW, #500
Washington, D.C. 20036

Andrew O. Isar, Esq.
Telecommunications Resellers Association
4312 92nd Ave., NW
Gig Harbor, WA 98335

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Avenue North
Nashville, TN 37219

Michael McRae
TCG
1133 21st.,NW
Washington, DC 20036

James Lamoureux
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

Jon E. Hastings