



BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

615 214-6301
Fax 615 214-7406

April 1, 1998

Guy M. Hicks
General Counsel

REC'D-TN
REGULATORY AUTH.
98 APR 1 PM 12 05
OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

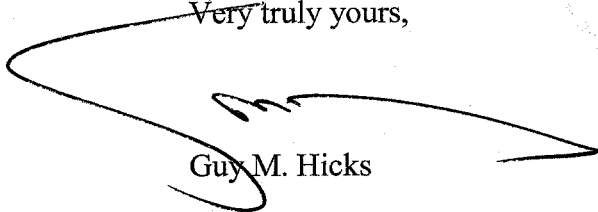
David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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 Joint Issues Matrix being filed on behalf of BellSouth, AT&T, MCI and Sprint. A copy has been provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

Enclosure

cc: David Epsteiner, Esquire
Susan Berlin, Esquire
Carolyn Roddy, Esquire

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

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

Joint Issues Matrix

Issue	Issue Description	BellSouth Position	AT&T Position
1	Has BellSouth met the requirements of Section 271(c)(1)(A) of the Telecommunications Act of 1996?	Yes.	No. Although Section 271 (c)(1)(A) (Track A) is the appropriate avenue under which BellSouth must apply for interLATA authority in Tennessee, it cannot meet Track A requirements at this time because it is not providing access and interconnection to a competitor who provides service to both residential and business subscribers exclusively or predominantly over its own facilities.
	(a) Has BellSouth entered into one or more binding agreements approved under Section 252 with unaffiliated competing providers of telephone exchange service in Tennessee?	(a) Yes. BellSouth has entered into a number of binding agreements approved under Section 252 with unaffiliated competing providers.	(a) Yes. AT&T and BellSouth have entered into an arbitrated agreement approved by the Commission under Section 252 on April 29, 1997.
	(b) Is BellSouth providing access and interconnection to its network facilities for the network facilities of such competing providers in Tennessee?	(b) Yes. BellSouth is providing access and interconnection to competing providers in Tennessee. For example, as of October 31, 1997 BellSouth had provisioned approximately 5,305 interconnection trunks	(b) No. BellSouth remains unable to provide access and interconnection to its network facilities in a non-discriminatory fashion. AT&T has submitted orders for network elements in Tennessee, Kentucky and

Issue	Issue Description	BellSouth Position	AT&T Position
		and 3,321 unbundled loops to CLECs in Tennessee.	Florida and has not received the requested elements in a non-discriminatory manner. Among other things, BellSouth has been unable to provide unbundled network elements, unbundled switching, or provide access to its operational support systems ("OSS") in a nondiscriminatory fashion, and BellSouth has not provided accurate billing to AT&T.
	(c) Are such competing providers providing telephone exchange service to residential and business customers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities in Tennessee?	(c) Yes. BellSouth has reason to believe that competing providers are providing service to residential and business customers either exclusively or predominantly over their own facilities in Tennessee. Witnesses: Varner (pp. 6-20); Milner (pp. 10-69)	(c) No. AT&T is not providing telephone exchange service in Tennessee and is not aware of any other competitor presently providing service to residential and business customers exclusively or predominantly over its own facilities. Witnesses: Gillan, Hamman, Falcone and Bradbury
2	Has BellSouth met the requirements of Section 271(c)(1)(B) of the Telecommunications Act of 1996? (a) Has an unaffiliated competing provider of telephone exchange service requested access and interconnection with BellSouth?	Yes. (a) Agreements have been entered into, as described above in answer to Issue 1.	No. Track B provides a limited avenue for entry under circumstances which are not present here. BellSouth is precluded from Track B because competing providers, including AT&T, have made qualifying requests for the access and interconnection described in Section 271 (c)(1)(A). (a) Yes. A number of such providers, including AT&T, have timely requested access and interconnection with BellSouth pursuant to Section 271(c)(1)(A). Track B, therefore, is unavailable to BellSouth in Tennessee.

Issue	Issue Description	BellSouth Position	AT&T Position
	(b) Has a statement of terms and conditions that BellSouth generally offers to provide access and interconnection been approved or permitted to take effect under Section 252(f)?	(b) Not yet. BellSouth's Statement has not yet been approved by the Authority. BellSouth's statement, however, is fully compliant with Section 252(f) and should be approved.	(b) No. BellSouth is seeking approval of such a statement in this proceeding.
3	Does BellSouth's Tennessee SGAT comply with each of the provisions of §§ 251 and 252(d) of the Act, and the regulations thereunder, as required by § 252(f) of the Act?	Yes. BellSouth's SGAT meets the requirements of Section 251 and 252(d) of the Act, which essentially mirror the requirements of the fourteen-point competitive checklist as set forth below. Witnesses: Varner (pp. 33-39); Milner (pp. 10-69); Calhoun (pp. 3-83); Moore (pp. 3-29)	No. BellSouth's SGAT does not comply with each of the provisions of §§ 251 and 252(d) of the Act, and the regulations thereunder, as required by § 252(f) of the Act. Witnesses: Gillan, Hamman, Bradbury, Falcone, and Dailey
4	Has BellSouth provided interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(i) and applicable rules promulgated by the FCC? (Checklist Item #1)	Yes. Interconnection Services are functionally available from BellSouth, and BellSouth has procedures in place for the ordering, provisioning and maintenance of its interconnection services, and therefore satisfies this checklist item. Witnesses: Varner (pp. 54-61); Calhoun (pp. 3-83); Milner (pp. 10-18)	No. Section 251 (c)(2) requires BellSouth to offer interconnection with its network for the transmission and routing of telephone exchange service and exchange access at any technically feasible point in the network, equal to the access BellSouth provides itself or other parties, and on rates, terms and conditions that are just, reasonable and nondiscriminatory. BellSouth currently does not provide such interconnection. Witnesses: Gillan, Hamman, Falcone and Bradbury
5	Has BellSouth provided nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 252(d)(1) of the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC? (Checklist Item #2)	Yes. Access is available and network elements are provided on a nondiscriminatory basis. Also, a number of physical collocation arrangements have been implemented in Tennessee. BellSouth has reached agreement for performance measurements with AT&T and with other CLECs. BellSouth has taken steps, including changes to its organizational structure and processes, to ensure that these measures are met. BellSouth	No. BellSouth must prove that it actually has provided non-discriminatory access to network elements at rates, terms and conditions that are just, reasonable and non-discriminatory. BellSouth has not done so. Among other things, BellSouth has not yet implemented nondiscriminatory access to its OSS (which itself is a network element) and consequently has not provided other network elements under terms and conditions that are just, reasonable and nondiscriminatory.

Issue	Issue Description	BellSouth Position	AT&T Position
		provides CLECs access to unbundled elements of BellSouth's network and therefore satisfies this checklist item. Witnesses: Varner (pp. 61-68); Calhoun (pp. 3-83); Milner (pp. 19-25); Moore (pp. 3-29)	Moreover, BellSouth's offered collocation method for obtaining unbundled network elements is discriminatory. Additionally, BellSouth cannot render an accurate, sufficiently detailed bill for usage sensitive network elements as required by the Act. Witnesses: Gillan, Hamman, Falcone and Bradbury
6	Has BellSouth provided nondiscriminatory access to the ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224 of the Communications Act of 1934 as amended by the Telecommunications Act of 1996, pursuant to 271(c)(2)(B)(iii) and applicable rules promulgated by the FCC? (Checklist Item #3)	Yes, BellSouth provides nondiscriminatory access to poles, ducts, conduits and rights-of-way to any CLEC by way of a standard agreement. Numerous CLECs have executed this agreement. Also, the functional availability of this access is proven by the fact that BellSouth has provided it to interexchange carriers, cable television and power companies for years. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 68-69); Milner (pp. 25-27)	No. BellSouth has not provided such access to AT&T and cannot demonstrate compliance with this checklist item until methods and procedures have been tested and implemented and it demonstrates that it can provide such access to competitors on a nondiscriminatory basis. Witness: Hamman
7	Has BellSouth unbundled the local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) and applicable rules promulgated by the FCC? (Checklist Item #4)	Yes. Unbundled local loop transmission is functionally available from BellSouth. BellSouth has implemented procedures for the ordering, provisioning, and maintenance of unbundled loops and sub-loops. BellSouth therefore satisfies this checklist item.	No. BellSouth first must develop adequate OSS to provide CLECs non-discriminatory access to allow provisioning and maintenance of loops. BellSouth also must implement a plan that allows for CLECs to obtain unbundled loops in collocated space on a nondiscriminatory basis and ensures that CLEC customers will not suffer service outages during cutovers. AT&T has submitted orders to BellSouth for unbundled loops in Tennessee, Kentucky and Florida, and has found that BellSouth remains unable to provision unbundled loops on a nondiscriminatory basis. Further, BellSouth has refused to unbundle IDLC loops.

Issue	Issue Description	BellSouth Position	AT&T Position
		Witnesses: Varner (pp. 69-75); Calhoun (pp. 3-83); Milner (pp. 35-37)	Witnesses: Gillan, Hamman, Falcone
8	Has BellSouth unbundled the local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) and applicable rules promulgated by the FCC? (Checklist Item #5)	Yes. Local transport is functionally available from BellSouth. BellSouth has technical service descriptions outlining dedicated and common interoffice transport and has procedures in place for the ordering, provisioning, and maintenance of these services. BellSouth provides local transport from the trunk side of its switches unbundled from switching or other services and therefore satisfies this checklist item. Witnesses: Varner (pp. 75-78); Calhoun (pp. 3-83); Milner (pp. 37-41)	No. BellSouth has not implemented adequate methods and procedures that insure that common transport can be provided between end offices and billed on a nondiscriminatory basis. Witness: Hamman
9	Has BellSouth provided unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271 (c)(2)(B)(vi) and applicable rules promulgated by the FCC? (Checklist Item #6)	Yes. Unbundled local switching is functionally available from BellSouth. BellSouth has a technical service description and has procedures in place for the ordering, provisioning, and maintenance of its switched services. BellSouth provides local switching unbundled from transport, local loop transmission or other services and therefore satisfies this checklist item. Witnesses: Varner (pp. 78-85); Calhoun (pp. 3-83); Milner (pp. 37-41)	No. BellSouth has not developed adequate methods and procedures to provide unbundled switching on a nondiscriminatory basis. BellSouth cannot provide accurate usage sensitive billing information for local switching and is not willing to provide all features and functionality in the switch. Witnesses: Gillan, Falcone
10	Has BellSouth provided nondiscriminatory access to the following, pursuant to Section 271(c)(2)(B)(vii) and applicable rules promulgated by the FCC: (a) 911 and E911 services;	(a) Yes. BellSouth offers nondiscriminatory access to 911 and E911 service. BellSouth has had procedures in place since early 1996 by which CLECs can connect their switches to BellSouth E911 tandems.	(a) No. BellSouth must develop adequate methods and procedures to provide nondiscriminatory access to 911 and E911 services.

Issue	Issue Description	BellSouth Position	AT&T Position
	(b) directory assistance services to allow the other telecommunications carrier's customers to obtain telephone numbers; c) operator call completion services? (Checklist Item #7)	(b) Yes. Nondiscriminatory access to directory assistance (DA services) is functionally available from BellSouth. (c) Yes. Operator call processing is functionally available from BellSouth, which allows CLECs to obtain both live operator and mechanized functionality. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 85-92); Milner (pp. 41-47)	(b) and (c) No. Although nondiscriminatory access is technically feasible and can be provided by direct routing from the switch or other means, BellSouth's provision of such access has been delayed. BellSouth continues to brand these services as its own even for AT&T customers. Witness: Hamman
11	Has BellSouth provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) and applicable rules promulgated by the FCC? (Checklist Item #8)	Yes, BellSouth arranges with its directory publisher to make available white pages directory listings to CLECs and their subscribers which include the subscriber's name, address, and telephone number at no charge, and thus satisfies this checklist item. Witnesses: Varner (pp. 92-95); Milner (pp. 47-50)	No. BellSouth has not met this requirement because BellSouth has not provided competitors with equivalent functionality to order directory listings electronically. Witness: Bradbury
12	Has BellSouth provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271 (c)(2)(B)(ix) and applicable rules promulgated by the FCC? (Checklist Item #9)	Yes. BellSouth provides nondiscriminatory access to telephone numbers. Also, BellSouth, as the North American Numbering Plan administrator for its territory, ensures that CLECs have nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 95-96); Milner (pp. 50-52)	No. BellSouth must establish methods and procedures for assignment of telephone numbers that apply to all competitors, and further must implement nondiscriminatory electronic ordering procedures and capabilities. Witnesses: Hamman, Bradbury

Issue	Issue Description	BellSouth Position	AT&T Position
13	Has BellSouth provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion pursuant to Section 271(c)(2)(B)(x) and applicable rules promulgated by the FCC? (Checklist Item #10)	Yes. BellSouth provides access to the signaling elements necessary for call routing and completion, including Signaling Links, Signal Transfer Points (STPs), and Service Control Points (SCPs). BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 96-102); Calhoun (pp. 3-83); Milner (pp. 52-56)	No. BellSouth has not implemented adequate methods and procedures for nondiscriminatory access to databases and associated signaling, nor has testing been conducted to determine how BellSouth will provide access to its Advanced Intelligent Network. Witness: Hamman
14	Has BellSouth provided number portability, pursuant to Section 271(c)(2)(B)(xi) and applicable rules promulgated by the FCC? (Checklist #11)	Yes. Until an industry-wide permanent solution can be achieved, BellSouth provides interim Service Provider Number Portability that allows customers switching from BellSouth to a CLEC to retain the same telephone number(s). BellSouth has interim number portability arrangements that are available, which include Remote Call Forwarding (RCF) and Direct Inward Dialing (DID). Interim number portability is functionally available from BellSouth. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 102-106); Calhoun (pp. 3-83); Milner (pp. 56-61)	No. BellSouth must provide interim number portability through remote call forwarding ("RCF"), direct inward dialing ("DID") trunks, or other comparable arrangements, with as little impairment to functioning, quality, reliability and convenience as possible. AT&T has requested use of Route Indexing – Portability Hub as the number portability solution, but the parties have not completed necessary testing. Further, BellSouth has not provided AT&T with billing information from number portability tests in Georgia to allow verification of successful porting of numbers. Witness: Hamman
15	Has BellSouth provided nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xii) and applicable rules promulgated by the FCC? (Checklist Item #12)	Yes. Local service subscribers in BellSouth's service area in Tennessee dial the same number of digits to place a local call, without the use of an access code, regardless of their choice of local service provider. This satisfies the local dialing parity requirement. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 106-107); Milner (pp. 61-63)	No. BellSouth has not provided such access to AT&T. Witness: Hamman

Issue	Issue Description	BellSouth Position	AT&T Position
16	Has BellSouth provided reciprocal compensation arrangements in accordance with the requirements of Section 252 (d)(2) of the Telecommunications Act of 1996, pursuant to Section 271 (c)(2)(B)(xii) and applicable rules promulgated by the FCC? (Checklist Item #13)	Yes. BellSouth has arrangements in place to provide reciprocal compensation. These arrangements provide for the mutual and reciprocal recovery of the costs of transporting and terminating local calls on BellSouth and CLEC networks. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 107-109); Milner (pp. 63-65)	No. BellSouth must implement methods and procedures for billing in order to comply with the requirement. Witness: Hamman
17	Has BellSouth provided telecommunications services available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3) of the Telecommunications Act of 1996, pursuant to Section 271(c)(2)(B)(xiv) and applicable rules promulgated by the FCC? (Checklist Item #14)	Yes. CLECs are able to resell BellSouth's telecommunications services. BellSouth has developed technical service descriptions in ordering, provisioning, and maintenance procedures for 50 of its top retail telecommunications services. BellSouth has developed processes for handling the ordering, provisioning, maintenance and repair of all resold services. BellSouth has also put organizations and processes in place to ensure that service standards are met. BellSouth therefore satisfies this checklist item. Witnesses: Varner (pp. 109-115); Calhoun (pp. 3-83); Milner (pp. 65-69)	No. BellSouth has imposed, unreasonable and discriminatory conditions or limitations on resold services because BellSouth has not provided nondiscriminatory access to OSS functions that support resale. In addition, BellSouth is not providing all resold services in a nondiscriminatory manner Witness: Bradbury
18	Is BellSouth providing non-discriminatory access to its Operational Support Systems?	Yes, BellSouth is providing non-discriminatory access to its Operational Support Systems.	No. BellSouth is not providing nondiscriminatory access to OSS functions. A comparison of the functionalities available to BellSouth for pre-ordering, ordering, provisioning, maintenance and repair, and billing through its internal interfaces and the functionalities currently available to CLECs through BellSouth's CLEC interfaces, demonstrates that CLECs do not have access to equivalent functionality. Furthermore, BellSouth has not provided performance data supporting its claim that

Issue	Issue Description	BellSouth Position	AT&T Position
		Witnesses: Varner (pp. 65-68; Calhoun (pp. 3-84)	CLECs have equivalent access to OSS functions in terms of quality, speed, and accuracy. Witnesses: Bradbury, Dailey
19	Has BellSouth developed appropriate performance measurements and, to the extent appropriate, performance standards? If so, have they been implemented and are they being met?	Yes. BellSouth has reached agreement for performance measurements with AT&T and other CLECs. BellSouth has taken steps, including changes to its organization structure and processes to ensure that these measures are met. The data developed by BellSouth demonstrates that CLECs are receiving nondiscriminatory access as required by the 1996 Act. Witness: Moore (pp. 3-29)	No. The performance standards and measurements proposed by BellSouth are insufficient to demonstrate parity or nondiscriminatory access. Further, BellSouth's proposed performance measurements have not been fully implemented and have not produced performance data sufficient to demonstrate nondiscriminatory access. Witnesses: Bradbury, Dailey
20	Is approval of BellSouth's entry into the interLATA market in Tennessee in the public interest?	Yes. Granting BellSouth in-region interLATA relief will spur competition and create investments and jobs and is therefore in the public interest in Tennessee. Witnesses: Varner (pp. 21-28); Harralson (pp. 2-20); Taylor (pp. 2-34); Raimondi (pp. 3-6)	The public interest is not served by BellSouth entry into the interLATA market at this time. Premature entry by BellSouth may harm existing competition in the long distance market and will remove any incentive for BellSouth to comply with its obligations necessary for local exchange competition to develop. Witness: Gillan

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 1998, a copy of the foregoing document was served on the parties of record, via facsimile, hand delivery, overnight or U. S. Mail, postage pre-paid, addressed as follows:

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

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

Dana Shaffer, Esquire
Nextlink
105 Malloy Street, #300
Nashville, TN 37201

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

Alaine Miller, Esquire
Nextlink
155 - 108th Ave. NE, #810
Bellevue, WA 98004

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

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823

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

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

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

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

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

Martha P. McMillin, Esquire
MCI Telecommunications Corp.
780 Johnson Ferry Road, #700
Atlanta, GA 30342

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

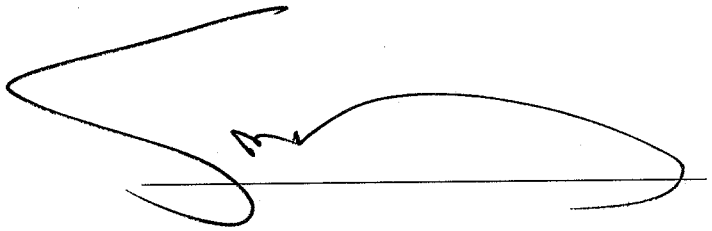
Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062

Michael McRae, Esquire
TCG
1133 21st St., NW, #400
Washington, DC 20036

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

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Ave., N.
Nashville, TN 37219

John L. Quinn
Nakamura & Quinn
2100 First Ave., N., #300
Birmingham, AL 35203

A handwritten signature in black ink, featuring a large, sweeping loop on the left and a smaller, more intricate mark in the center, followed by a horizontal line extending to the right.