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December 17, 1998

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Guy M. Hicks
General Counsel

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 a matrix outlining the issues raised by the Federal Communications Commission ("FCC") in its Second Louisiana Order, CC Docket No. 98-121, with respect to the checklist items which the FCC found BellSouth had not satisfied. The matrix also includes BellSouth's response as well as the applicable reference to the record in this proceeding (to the extent available). Certain matters addressed in BellSouth's response are not part of the current record before the Authority, primarily because they relate to events that have occurred in recent months. However, BellSouth feels compelled to bring these matters to the Authority's attention as part of BellSouth's continuing obligation, pursuant to the Report and Recommendation of the Hearing Officer dated April 18, 1997, to act in good faith in keeping the Authority fully informed of "any changes, revisions, or additions" to its Section 271 application. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

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CHECKLIST ITEM NO. 1: INTERCONNECTION

Issues Raised by the FCC	BST Response
BST fails to include specific provisions regarding the terms and conditions for certain aspects of collocation in a legally binding document. (para. 66)	BST provides "legally binding" terms and conditions for collocation through: (1) its Collocation Handbook, which is incorporated into the SGAT; and (2) collocation agreements between BST and CLECs. BellSouth has modified the language in its Collocation Handbook (Version 7.1.2) to address the FCC's concerns.
BST has not committed to provisioning intervals for collocation in a legally binding document, including intervals for the installation of virtual collocation. (para. 71)	The SGAT is a legally binding document that incorporates BST's Collocation Handbook. Version 7.1.2 contains provisioning intervals for physical and virtual collocation.
BST has not provided data demonstrating that it provides collocation in such a manner as to allow CLECs a "meaningful opportunity to compete." (para. 72)	The evidence in the record reflects that, of the 20 physical collocation arrangements in place in Tennessee at the time of the hearing, the average provisioning interval was 82 days, and in no case did it exceed 101 days. (Milner, Vol. VIC Tr. at 148-102).
BST's SGAT does not quantify collocation space preparation fees. (para. 73)	The Authority will establish collocation space preparation fees in Docket 97-01262, which will be incorporated into the SGAT.
BST performance data does not demonstrate that the service BST provides to CLECs (trunk blockage) is equal in quality that BST provides to itself. In future applications BST should explain how it derives and calculates it performance data. (para. 77)	It is unclear how the FCC came to this conclusion. BST's performance data for trunk blockage consistently reflects comparable (if not lower) blockage rates for CLECs. For example, in Tennessee, for the period May 1998 to June 1998, none of the 26 BST administered trunk groups used by CLECs experienced blocking in excess of 3%; likewise, none of the 344 BST administered trunk groups in BST's local network experienced blocking in excess of 3% during the same time period. (Stacy 7/20/98 Performance Meaurements Affidavit, Exh. 3). Current regional and state-wide trunk blockage data can be found on BellSouth's website, https://clec.bellsouth.com

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CHECKLIST ITEM NO. 2: UNBUNDLED ACCESS

Issues Raised by the FCC	BST Response
BST fails to demonstrate that CGI-LENS and LENS interfaces provide nondiscriminatory access to OSS pre-ordering functions. (para. 96)	BST disagrees with the FCC's findings concerning CGI-LENS, which does allow a CLEC to integrate pre-ordering and ordering functions. In addition, the Application Program Interface (the Telecommunications Applications Gateway, or API/TAG) is now available and supports both pre-ordering and ordering functionality and is fully integratable. (FCC Order para. 95)
BST provides no evidence that CGI-LENS has been commercially developed and used by any CLEC for a purpose other than the limited one of ordering CSR information. Limited scope of Albion prototype (new resale residential order) diminishes its potential weight as third-party evidence. (paras.100, 102)	BST has provided CLECs with updated CGI-LENS specifications so they can integrate pre-ordering and ordering functions; that they may have elected not to do so other than for purposes of obtaining CSRs should not be held against BST. Regardless of the scope of Albion project, it clearly demonstrates that CGI-LENs is functionally available to CLECs and gives CLECs a meaningful opportunity to compete. (Stacy Vol. IIIE Tr. at 286 & Vol. IVE Tr. at 244-48). In addition, API/TAG is now available, which supports both pre-ordering and ordering functionality and is fully interatable. (FCC Order para. 95)
Method of calculating initial due dates in LENS is discriminatory. (para. 104)	The automatic due date calculation feature was added to the inquiry mode of LENS on November 14, 1998. (FCC Order para. 106).
BST presents aggregate flow-through data for both EDI and LENS orders, even though BST relies only on its EDI interface to demonstrate that it provides nondiscriminatory access to ordering and provisioning. (para. 111)	Disaggregated flow-through data for EDI and LENS is now available. This data demonstrates a 97.61% flow-through for EDI, and a 94.35% flow-through for LENS in September 1998. Current regional and state-wide flow-through data can be found on BellSouth's website, https://clec.bellsouth.com

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BST adjusts its flow-through data upward to account for CLEC errors based on its own analysis of the error type and party at fault but provides no evidentiary support for its conclusions. (para. 113)	BST has prepared detailed error analysis for BST and CLECs. The analysis for July – September 1998 supports BST's data which shows that CLEC errors have decreased from 17.09% in July 1998 to 10.22% in September 1998.
Lack of integration between BST's interfaces contributed to BST's low flow-through rates. (para. 115)	BST disagrees with the FCC's findings which are not supported by the evidence. Although the FCC claims that the order flow-through rates for LENS (which provides integrated pre-ordering and ordering) are higher than EDI flow-through rates, the performance data for August and September 1998 indicates that the opposite is true. Furthermore, BST has provided updated CGI-LENS specifications and implemented the API/TAG interface which provides the integration capability.
BST's own data indicates that more than 80 percent of BST's rejection notices still require manual re-keying. (para. 119)	BST disagrees with the FCC's findings which are based upon assertions by AT&T that BST disputes. BST's data reflects that 42% of BST's rejection notices were analyzed manually in September 1998, although they were both received and returned electronically. This number will continue to decrease each month, as error coding is refined.
BST provides no data concerning its provision of FOC equivalent information to its retail operations. (para.123)	There simply is no retail analogue for a FOC that is created in BST's operation. Nevertheless, BST's performance data demonstrates that CLECS are receiving nondiscriminatory access. This is clear by comparing the sum of the CLEC FOC time to the installation interval (which estimates total service order cycle time) with comparable data for BST, even assuming the equivalent FOC time for BST is minimal.

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Issues Raised by the FCC	BST Response
BST's own data demonstrates that there is a significant disparity between the average installation intervals for CLECs and BST's own retail operations. (para. 126).	The FCC came to this conclusion, only by selectively examining the relevant performance data. For example, the evidence in this record demonstrates that the average installation interval for CLECs is considerably shorter than that for BellSouth retail customers for orders that require a dispatch. (Stacy 7/20/98 Performance Meaurements Affidavit, Exh. 3). Current regional and state-wide installation data can be found on BellSouth's website, https://clec.bellsouth.com
Three of BST's performance measurements when added together measure the total interval of time between BST's receipt of a valid service order and its issuance of a notice to a CLEC that service has been installed: (1) FOC interval; (2) Average Installation Interval; (3) Completion Notice Interval. (para.127)	The FOC Interval + Average Installation Interval ensures that BellSouth is providing nondiscriminatory access because it measures the interval required to deliver service to a CLEC's end user. By contrast, the Completion Notice Interval measures the interval between that service delivery and notification of the CLEC, primarily so the CLEC can begin billing. It is appropriate to separate and consider these measurements individually.
BST provides no data showing the "average completion interval," but states that it is currently developing a performance measure for "average completion notice interval." (para. 130)	BST has completed development of its "average completion interval." The data for July – September 1998 demonstrates that BST is providing substantially the same, and in many cases better, service for CLECs than for itself. Current regional and state-wide average completion interval data can be found on BellSouth's website, https://clec.bellsouth.com.
BST does not disaggregate CLEC's flow-through orders for UNEs placed over the EDI interface. (para. 138)	When an order is received, it is handled by the same systems, regardless of whether the order originated in EDI or LENS. Any disaggregation of flow-through data between EDI and LENS based on the order type (UNE or resale) points to the CLEC's use of the interface, not the capabilities of the system.

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Issues Raised by the FCC	BST Response
BST has not adequately supported its claim that its EDI interface has sufficient capacity to meet reasonably foreseeable demand. (para. 139)	BST disagrees with the FCC's findings. Tests conducted in April 1998 were based upon forecast demand from CLECs, which verified that the combined ordering capacity of EDI and LENS was more than 14,500 local service requests per day. (Stacy 7/20/98 OSS Affidavit, para. 192).
BST internal testing results do not address whether the ordering functionality for UNEs is nondiscriminatory. BST fails to provide any end to end testing of its interfaces for UNEs. (para. 140)	Both the commercial usage of network elements and the performance measures for those elements demonstrate that they are being provided in a nondiscriminatory fashion. Despite such evidence, it appears that the FCC is now suggesting the equivalent of the extensive testing recommended by the NY PSC to Bell Atlantic and endorsed by the DOJ. This level of testing has not been suggested by the FCC before.
BST does not provide CLECs the ability to order combinations of UNEs where the CLECs performs the combining. (para. 141)	BST disagrees with the FCC's findings. BST accepts orders for unbundled network elements, which the CLEC can combine, and BST provides certain combinations as set forth in its SGAT. Furthermore, BST's performance data demonstrates that BST has successfully provisioned numerous unbundled network elements in its region, which CLECs have either combined with their own facilities or with other unbundled network elements purchased from BST.

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Issues Raised by the FCC	BST Response
BST fails to demonstrate that the ordering process it offers to CLECs for interim number portability, complex directory listings, and split accounts meet the nondiscriminatory requirement. (para. 142)	BST disagrees with the FCC's findings. First, number portability can be ordered and provisioned electronically, and BST is providing number portability in a nondiscriminatory fashion. As of June 1, 1998 , BST had successfully ported more than 60,000 numbers in its region. (Milner 7/20/98 Affidavit, para. 153). Second, split accounts and complex directory listings are not ordered electronically for BST's retail units, and the processes used by CLECs are substantially the same as those used by BST. The FCC's apparent desire that BST create processes for CLECs that it does not use itself goes far beyond the nondiscriminatory access requirement. Although not required by the Act, agreements to add electronic ordering features to support these activities are being negotiated with CLECs as part of a systems release combining features of EDI versions 8, 9 and 10 which is scheduled for July 23, 1999.
BST does not indicate which performance measures establish that CLECs are able to use TAFI to gain nondiscriminatory access to BST's repair and maintenance systems. (para. 147)	BST disagrees with the FCC's findings. BST's performance data demonstrates that: (1) the OSS response times for BST's TAFI/WFA and the CLEC's TAFI/EC-TA/T1-M1 are substantially similar; and (2) CLECs using TAFI (for telephone number services), EC-TA (for telephone number services or circuit numbered services), or T1-M1 (for interconnection trunks), receive repair and maintenance service from BST in a nondiscriminatory fashion. Current regional and state-wide maintenance and repair data can be found on BellSouth's website, https://clec.bellsouth.com.

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Issues Raised by the FCC	BST Response
TAFI does not provide nondiscriminatory access because it cannot be used for all types of services. (para. 149)	BST does not use TAFI for all types of services; rather BST uses another interface for designed services trouble reports (Work Force Administration/Control or WFA), which is available to CLECs. CLECs can use TAFI for the same type of trouble reports as BST uses TAFI. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.
TAFI is a" human to machine interface," meaning that new entrants using TAFI cannot integrate it with the entrant's own back office systems. (para. 151)	TAFI provides CLECs with the same functionality as BST provides itself. The FCC wants TAFI to be a machine-to-machine interface, which BST does not provide for itself. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.
BST T1/M1 interface provides no flow through into BST's legacy repair and maintenance systems, and does not provide parity with the systems that BST uses itself. (para. 154)	BST disagrees with the FCC's findings. T1/M1 is an electronic interface by which carriers can submit trouble reports for trunks or circuit numbered services. It is simply an electronic interface to WFA, which is the same system used by BST for designed services trouble reports.
BST presents no evidence that its EC-CPM interface offers CLECs the ability to access the same repair and maintenance functionalities as BST provides itself. BST has failed to provide any evidence of either commercial usage or the operational readiness of this interface. (para. 155)	BST disagrees with the FCC's findings. EC-CPM is an electronic interface by which carriers can submit trouble reports for trunks or circuit numbered services. It is simply an electronic interface to WFA, which is the same system used by BST for designed services trouble reports.
BST cannot limit a CLEC's choice to collocation as the only method for gaining access to and recombining UNEs. (para. 164)	While the FCC made clear its belief that collocation alone will not satisfy this checklist item, the FCC did not offer any alternative that it would consider sufficient. The FCC's statement that BellSouth "limits" CLECs to collocation is inaccurate. BellSouth's position is, and has been, that collocation is the only viable alternative at present, but BellSouth is willing to consider any other alternatives proposed. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.

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CHECKLIST ITEM NO. 2: UNBUNDLED ACCESS

Issues Raised by the FCC	BST Response
BST fails to show that, through either commercial use or testing, that it can provide access to network elements through collocation in a timely and reliable manner that would allow CLECs to recombine network elements to meet reasonable foreseeable demand. (para. 165)	It is the CLECs legal responsibility to combine network elements. How a CLEC chooses to do this within its collocation arrangements is up to that CLEC. Thus, "testing" of combining unbundled network elements is not practical or possible since CLECs may choose differing means of effecting such combinations.

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CHECKLIST ITEM NO. 4: UNBUNDLED LOOPS

Issues Raised by the FCC	BST Response
BST's performance results for unbundled loops fail to demonstrate whether BST meets its target intervals. (para. 196)	The evidence in this record demonstrates that BST meets its target intervals. For example, in June 1998, the average interval in Tennessee for provisioning unbundled loops with less than 10 circuits which required a dispatch was 8.57 days (design) and 9.28 days (nondesign). During this same time period, BellSouth met 90.1% (design) and 98.7% (nondesign) of its installation appointments for CLEC customers. (Stacy 7/20/98 Performance Meaurements Affidavit, Exh. 3). Current regional and state-wide provisioning data for unbundled loops can be found on BellSouth's website, https://clec.bellsouth.com.
BST fails to disaggregate its performance data according to whether the unbundled loop was provisioned with or without number portability. (para. 197).	BST now disaggregates its performance measurements data in the manner requested by the FCC. Current regional and state-wide provisioning data for unbundled loops can be found on BellSouth's website, https://clec.bellsouth.com.

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CHECKLIST ITEM NO. 5: UNBUNDLED LOCAL TRANSPORT

Issues Raised by the FCC	BST Response
BST fails to submit persuasive evidence that its OSS functions provide access to local transport on a nondiscriminatory basis. We believe performance data specifically measuring the provisioning of dedicated and shared transport facilities would be persuasive. (para. 206)	Since no commentators addressed this issue, it does not seem appropriate for the FCC to demand additional performance data as "persuasive evidence." In any event, BST's most recent performance data reflect that BST provisions transport facilities to CLECs in substantially the same time and manner as BST does for itself. Current regional and state-wide provisioning data for unbundled unbundled transport can be found on BellSouth's website, https://clec.bellsouth.com

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CHECKLIST ITEM NO. 6: UNBUNDLED LOCAL SWITCHING

Issues Raised by the FCC	BST Response
BST fails to acknowledge that it is legally obligated to provide all vertical features "that the switch is capable of providing." (para. 216)	CLECs have access to all the vertical features that the switch is capable of providing (features that are loaded in the switch software and that have been activated), whether or not BST offers those features to its retail customers. Although not required to do so, BST will provide CLECs access via the Bona Fide Request process to vertical features that are loaded in the switch software, but that have not yet been activated. BellSouth is not required to provide CLECs with access to vertical features that are not loaded in the switch software because this would require BST to provide a superior network to CLECs than BST uses for its own retail customers. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.
BST does not demonstrate that it can make customized routing practically available in a nondiscriminatory manner due to the inability of CLECs to order customized routing efficiently. (para. 223)	The FCC agreed that CLECs must advise BST how to route its customers' calls (¶ 224). Accordingly, it is necessary for the CLEC to provide the required routing instructions at the time the CLEC places its orders.
BST does not demonstrate that purchasers of unbundled local switching can provide exchange access service to IXCs through the use of the unbundled local switch because it fails to demonstrate that it is able to provide these carriers with the usage information necessary to bill for exchange access. (para.230)	The capability to provide timely and accurate information necessary for CLECs to bill for intraLATA exchange access services was implemented on October 31, 1998, and this billing data is available to any interested CLEC. The information necessary for CLECs to bill for interLATA exchange access services has been available for some time. BST has provided and will continue to provide this billing data to interested CLECs.
BST does not provide CLECs with information necessary to bill for reciprocal compensation or, alternatively, that it have in place other arrangements such as a surrogate. (para. 232)	It appears that CLEC-to-CLEC traffic is the problem that the FCC is addressing. In ¶ 234, the FCC states that BST believes it is not legally obligated to provide billing information for terminating traffic. That is not BST's position. The FCC also ignored BST's surrogate method and did not specify what it would accept as a "reasonable surrogate." This issue is a subject of BST's Petition for Reconsideration pending before the FCC.

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CHECKLIST ITEM NO. 7(II) & 7(III): OPERATOR SERVICES & DIRECTORY DATABASES

Issues Raised by the FCC	BST Response
BST has not separated the performance data for Operator Services and Directory Assistance between itself and competing carriers. If BST seeks to rely on such performance data to demonstrate compliance, it should either disaggregate the data or explain why disaggregation is not feasible or unnecessary to show nondiscrimination. (para. 245)	It is only technically feasible to disaggregate the data in the manner requested by the FCC when the CLEC's calls are carried by trunk groups that are separate from the trunk groups carrying BST's calls. Separate trunk groups are used when either the CLEC has installed its own switch or when the CLEC purchases switching from BST (either through resale or as a UNE) in conjunction with customized routing. To the extent that a CLEC uses BST's switching but chooses not to use customized routing, disaggregation of the performance data is not feasible nor is it required to show nondiscrimination since, in this case, the same trunk groups are used to carry BST's calls as are used to carry the CLECs' calls.
BST fails to demonstrate that it complies with our rebranding requirements. BST fails to offer any explanation of why their method of rebranding results in nondiscriminatory access. (para.247)	BST's method of rebranding is nondiscriminatory because BST, which also delivers traffic over dedicated trunks from each end office to BellSouth's directory assistance and operator services platform, uses the same trunking architecture as CLECs. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.
BST fails to demonstrate that it provides the subscriber listing information in its directory assistance database in a way that allows CLECs to incorporate that information into their own database. BST concedes that the database provided to CLECs does not contain all listings that are in BST's own directory assistance and operator services databases. (para. 249)	The FCC apparently would have BST either: (1) include listings of customers of CLECs and independents whose contracts prohibit BST from doing so (and thereby expose BST to a potential breach of contract claim); or (2) exclude listings of those customers from BST's database entirely. While BST could seek to renegotiate its contracts, there is no guarantee that BST would be able to do so.

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CHECKLIST ITEM NO. 11: NUMBER PORTABILITY

Issues Raised by the FCC	BST Response
BST does not demonstrate that it is adequately coordinating unbundled loops with its provision of number portability. BST does not make clear the period between the completion of the loop cutover and the start of the interim number portability provisioning. BST has not indicated how long the customer is without service, including how long the customer is without the ability to receive calls. BST performance data is not disaggregated to show performance for loops with number portability separately from loops without number portability. (paras. 279, 281)	BellSouth now disaggregates its performance data in the manner requested by the FCC. Coordinated Customer Conversion data for October 1998 demonstrates that the region-wide average cutover time for loops with number portability was 7.18 minutes, while the average cutover time for loops without number portability was 8.36 minutes. Current regional and state-wide Customer conversion data can be found on BellSouth's website, https://clec.bellsouth.com
BST does not sufficiently demonstrate that CLECs can access BST operational support systems to order and provision interim number portability efficiently (see checklist item (ii). (para. 285)	BST disagrees with the FCC's findings. As of June 1, 1998, BST had successfully ported more than 60,000 numbers in its region using interim number portability methods. (Milner 7/20/98 Affidavit, para. 153).
BST is engaging in, and the Louisiana PSC has approved, practices that may not comply with the FCC's pricing rules and competitive neutrality guidelines, such as assessing all the incremental cost of interim number portability on the CLEC, and not sharing the terminating access revenue from calls to ported numbers. (para. 289)	The prices charged by BST for number portability will be established by the Authority in Docket No. 97-01262. This issue is a subject of BST's Petition for Reconsideration pending before the FCC.

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CHECKLIST ITEM NO. 14: RESALE

Issues Raised by the FCC	BST Response
We conclude that, but for deficiencies in its OSS systems BST demonstrates that it makes telecommunications services available for resale in accordance with sections 251(c)(4) and 252(d)(3). (para.309)	As demonstrated above, the "deficiencies" in BST's OSS identified by the FCC are not deficiencies at all (e.g., TAFI) or have been rendered moot (e.g., APT/TAG provides integrated pre-ordering and ordering interface). Furthermore, given that as of Feb. 1, 1998, BST had over 80,000 resold services in place in Tennessee, it should be readily apparent that BST has satisfied its resale obligations. (Milner 7/20/98 Affidavit, para. 165).

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 1998, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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