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December 17, 1998

BY HAND

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Diskette Included - Gave to Counsel

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

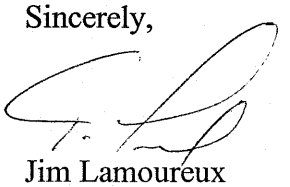
Dear Mr. Waddell:

Pursuant the Hearing Officer's request at the November 19, 1998, Status Conference in the above-captioned proceeding, enclosed are an original and thirteen copies of matrices which set forth in summary fashion: (1) the findings of the FCC in its October 13, 1998, Memorandum Opinion and Order on those items of the Act's Competitive Checklist which the FCC concluded BellSouth failed to meet in its second Louisiana 271 application, and (2) AT&T's position in this proceeding as to BellSouth's compliance in Tennessee with the corresponding items of the Competitive Checklist.

Please note that AT&T is submitting two matrices. One addresses each of the enumerated Competitive Checklist items which the FCC concluded BellSouth failed to meet in its second Louisiana application. The second specifically addresses the FCC's findings with respect to Operations Support Systems ("OSS"). Earlier in this proceeding, the parties filed matrices addressing the findings of the FCC as to OSS issues with respect to BellSouth's South Carolina and first Louisiana 271 applications. The attached OSS matrix updates AT&T's earlier OSS matrix and includes the FCC's OSS findings from its October 13, 1998, Memorandum Opinion and Order.

Also attached are electronic copies of both of AT&T's matrices. I have enclosed an additional copy of this cover letter and the attached matrices, which I would appreciate being stamped as filed and returned for my files. Thank you for your assistance in this matter. If you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,



Jim Lamoureux

Encls.

cc: Counsel for all Parties of Record
Chairman Malone
Director Greer
Director Kyle
Richard Collier

CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that on this 17th day of December, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:

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BELLSOUTH COMPLIANCE WITH SECTION 271 CHECKLIST ITEMS

	AT&T's Position Re: BellSouth in Tennessee	BellSouth Deficiencies in 2nd Louisiana Order FCC 98-121
CHECKLIST COMPLIANCE		
Item 1 – Interconnection	BellSouth does not meet checklist item 1.	"BellSouth does not demonstrate that, as a legal and practical matter, it provides interconnection in accordance with the requirements of section 251(c)(2) and 252(d)(1), as incorporated in section 271." [FN] **¶ 65**
	AT&T's experience demonstrates that BellSouth does not provide interconnection as required by the federal Act. (Hamman, Tr. v. 9, 91-95.) BellSouth has made it difficult to interconnect. (Hamman, Tr. v. 9, 9-92) BellSouth also enforces requirements that detrimentally affect the service of the customers of CLECs that interconnect with BellSouth. As a result, increased trunk blocking occurred on these trunk groups and the calls of CLEC customers did not go through. (Land, Dir. 10.) This blockage initially did not affect BellSouth's own local customers because their calls did not travel over these trunk groups. Only after BellSouth began to experience trunk blocking problems for its own customers did it agree to give CLECs access to the local tandems. (Land, Tr. v. 8, 195)	"BellSouth fails to make a prima facie showing that it is providing interconnection equivalent to the interconnection it provides itself." [FN] **¶ 74** "In future applications, we expect BellSouth to explain how it derives and calculates its performance data, including trunk blockage data, and to demonstrate that it meets the equal in quality and nondiscrimination requirements." **¶ 77**

BELLSOUTH COMPLIANCE WITH SECTION 271 CHECKLIST ITEMS

----Collocation	BellSouth's Collocation offering in Tennessee suffers from the same defects as those identified by the FCC in the South Carolina decision and the Second Louisiana order. BellSouth's changes made to its Tennessee SGAT have already been rejected by the FCC. (See Varner, Tr. v.2B, pp. 77-79)	"While BellSouth has provided information regarding terms and conditions of its collocation offerings, it has not done so in a legally binding document." [FN] **¶ 68** "Because BellSouth fails to include any collocation intervals in its SGAT and instead relies on its Collocation Handbook, it has not corrected a deficiency identified in the BellSouth South Carolina Order." **¶ 70** "BellSouth has not demonstrated that the intervals outlined in the Collocation Handbook are "just, reasonable, and non-discriminatory. We have determined that BellSouth fails to satisfy item [1] of the competitive checklist because it does not demonstrate that it offers collocation on rates, terms, and conditions that are 'just, reasonable, and nondiscriminatory' in accordance with section 251 (c) (2)." [FN] **¶ 73**
Checklist Item 2 – Unbundled Network Elements **----OSS**	BellSouth fails to meet this checklist item because its OSS do not provide nondiscriminatory access and because it does not provide UNEs in a nondiscriminatory fashion.[1]	"We conclude . . . that BellSouth does not make a prima facie case that it satisfies the requirements of checklist item (ii)." **¶91**.

[1] BellSouth's OSS deficiencies are discussed in the attached matrix, which is an updated version of a matrix previously filed with the TRA.

BELLSOUTH COMPLIANCE WITH SECTION 271 CHECKLIST ITEMS

---- Combining Network Elements	In order for CLECs to use combinations of unbundled network elements to provide telecommunications services in Tennessee, BellSouth improperly insists: (1) that elements must be physically separated from one another, and (2) that CLECs purchase collocated space from BellSouth and use collocated facilities in order to combine the elements. (Varner, Tr. v.1, 51, 113, 153.) BellSouth has offered no other option for the use of combinations of elements. BellSouth has rejected four potential alternatives proposed by AT&T. (*See* Falcone, Ex. No. RVF-2.)	"BellSouth does not demonstrate that, as a legal and practical matter, it can make access to unbundled network elements available in a manner that satisfies the requirements of section 251(c)(3), as incorporated in section 271." [FN] **¶164**
	BellSouth's requirement adds unnecessary costs and delay and denies CLECs access to certain network capabilities including integrated digital loop carrier ("IDLC") and "recent change capability of the switch. (Falcone Dir. 27.) BellSouth's requirement imposes inherently inferior service for CLEC customers served by combinations. (Falcone, Dir. 21; Tr. v.7, 261-62.) Unnecessary handling of the fragile wires that connect to the MDF will increase the potential for broken connections. (Falcone, Dir. 21.) BellSouth's policy violates AT&T's Interconnection Agreement, the Federal Act and Tennessee statutes. Unbundling of network elements does not require physical separation. The switch has a recent change capability which allows logical or electronic separation of the loop and port. BellSouth currently uses this capability to provide service to its own customers. (Falcone, Dir. 29-30.) BellSouth also provides this capability to its CENTREX customers through a firewall that allows those customers to affect only their own lines. (Falcone Dir. 29-30; Tr. v.7, 264). AT&T has proposed using this capability to separate loops and ports, and BellSouth has refused, for no other reason than its policy	"BellSouth can not limit a competitive carrier's choice to collocation as the only method for gaining access to and recombining network elements." **¶ 164** "In addition, BellSouth's offering in Louisiana of collocation as the sole method for combining unbundled network elements is inconsistent with section 251(c) (3)." [FN] **¶ 168** "BellSouth must prove the efficacy of its collocation arrangement in order to demonstrate that, as a legal and practical matter, BellSouth can 'provide . . . unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.... And in a manner that allows competitors to accommodate both current and projected demand for unbundled network elements and combinations of unbundled network elements." [FN] **¶ 166** "BellSouth fails to demonstrate that, as a legal and practical matter, it can make available access to unbundled network elements through collocation in a manner that allows new entrants to combine network elements and provide competitive service on a widespread basis." **¶ 167**

	position that the word "unbundled" in the federal Act means only physical separation.	
Checklist Item 4 – Unbundled local Loops	BellSouth has not demonstrated that it has met this checklist item. BellSouth does not have adequate methods and procedures to ensure coordination at loop cutovers to minimize customer service disruption. (Hamman, Dir. 33.) Moreover, BellSouth has never tested its ability to actually provision a loop. (Milner, v. 7, 31-32.) BellSouth's provisioning intervals for loops are uncertain and subject to negotiation. Without certainty, CLECs cannot have meaningful opportunities to compete. BellSouth also fails to satisfy this checklist item because it refuses to allow CLECs access to integrated digital loop carrier ("IDLC") technology. As the TRA already has determined, denial of access to IDLC is discriminatory and will result in CLEC customers receiving service inferior to that enjoyed by BellSouth's retail customers. Directors Conference, Docket No. 97-01262, Tr. at 26-27 (June 30, 1998).	"We find that BellSouth fails to demonstrate that it provides local loop transmission, unbundled from local switching or other services, in accordance with our rules." **¶ 189** "In particular, BellSouth fails to demonstrate that it provides access for the provisioning and ordering of unbundled local loops sufficient to allow an efficient competitor a meaningful opportunity to compete." [FN] Also, BST fails to demonstrate that it can provide loop cutovers based on reasonably foreseeable demand in a timely and reliable fashion. **¶ 192** "Because the provisioning of unbundled local loops has no retail analogue, BellSouth must demonstrate that it provides unbundled loops in a manner that offers an efficient carrier a meaningful opportunity to compete. [FN] In future applications, we expect BellSouth to explain how it derives and calculates its data on loop provisioning and why its performance data demonstrates that competitive LECs have nondiscriminatory access to unbundled loops. Furthermore, BellSouth should identify any performance standards that have been adopted by the relevant state commission or agreed upon by the parties in an interconnection agreement or during the implementation of such an agreement in order to serve as a basis for comparing BellSouth's provisioning intervals." [FN] **¶ 198**
Checklist Item 5 - Unbundled Loop Transport	BellSouth cannot claim that the common transport it currently has in its network can be utilized by CLECs without some additional work. (Hamman, Dir. 35)	"BellSouth has failed to persuade us that it provides nondiscriminatory access to unbundled local transport." **¶206.**

	BellSouth has not put in place the methods and procedures that provide certainty that common transport can be provided between end offices and billed on a nondiscriminatory basis. (Hamman, Dir. 24-25.) BellSouth's inability to confirm and bill transport suggests that it cannot provide this item on an unbundled basis.	"Although we do not require a particular type of evidence to demonstrate nondiscriminatory access, we believe that performance data specifically measuring the provisioning of dedicated and shared transport facilities would be persuasive." [FN] **¶ 206**. BST submits evidence in which it aggregates its performance results for local transport with all "design circuit orders" which includes unbundled loops. We find this to be an insufficient measure of demonstrating that BST provides nondiscriminatory access to dedicated and shared transport **¶206**
Checklist Item 6 – Unbundled Local Switching	BellSouth has not established that it offers nondiscriminatory access to unbundled local switching. First, BellSouth does not allow CLECs access to all of the vertical features in the switch, or the recent change capability of the switch to connect and disconnect customers. Second, BellSouth cannot yet provision direct routing. Finally, BellSouth cannot yet provide usage sensitive billing which includes the identification code of the interexchange carrier.	"BellSouth does not demonstrate that it is providing local switching unbundled from transport, local loop transmission, or other services, [FN] and thus does not satisfy the requirements of checklist item (vi)." **¶ 210** "BellSouth fails to make a *prima facie* showing that it provides vertical features, customized routing, and usage information for billing for exchange access and reciprocal compensation in accordance with our rules." **¶ 210** BST does show that it is providing requesting carriers with access to line-side and trunk side facilities. **¶212**
---Vertical Features	BellSouth only offers those vertical features reflected in its retail tariffs that it provides to its own retail customers. (Varner, Tr. v. 2, 65; Milner, Tr. v. 7, 38.) This includes features which BellSouth bundles together as a retail offering.	BST fails to demonstrate that it is legally obligated to provide all vertical features of a switch. BST believes that it only has to provide those features that it offers to its own customers. The FCC disagrees. **¶216**.
--- Customized Routing	Generally there are two means to provide direct routing: through switch translations using Line Class Codes ("LCCs") or through an Advanced Intelligent Network ("AIN") database solution. (Hamman, Dir. 37.) As implemented by BellSouth, however, the LCC method is unduly expensive and discriminatory. BellSouth insists that AT&T supply the BellSouth-	"BellSouth does not meet the requirements …that an incumbent LEC provide technically feasible customized routing functions." [FN] BellSouth does not demonstrate that it can make customized routing [via LCC] practically available in a nondiscriminatory manner due to the inability of competitive LECs to order customized routing efficiently.

	developed LCCs for each Local Service Request ("LSR"). (Hamman, Dir. 40.) Such a requirement is unreasonable and impractical; it is also discriminatory because BellSouth representatives need not enter LCCs on their orders. (*See id.* at 40-41.)	**¶223.** "In future applications, we expect BellSouth to demonstrate that, if it requires specific information for selective routing that results in manual intervention in the processing of such orders, BellSouth will be able to process such orders in a timely manner and in volumes reflecting reasonably foreseeable demand. Of course, the easiest way for BellSouth to make this demonstration is to ensure that orders that include selective routing information do not require manual intervention." **¶ 225**
	AIN is not offered in Tennessee. (Milner Tr. v.7a, p.60)	BellSouth concedes that AIN is not currently being offered. "BellSouth's proposed AIN solution currently cannot be relied upon to show compliance with the requirement for the provision of customized routing." [FN] **¶ 222**
--- Usage Information for Billing Exchange Access	BellSouth restricts the ability of CLECs that have purchased local switching from BellSouth to bill access charges by failing to provide terminating usage details. (Hamman, Dir. 38.) BellSouth admitted it currently is unable to provide the details to permit CLECs to bill other carriers for exchange access. (Varner, Tr. v.1a. at 107.) Mr. Varner was unable to provide a date by which this will be accomplished. (*Id.* at 111)	"BellSouth does not demonstrate that purchasers of unbundled local switching can provide exchange access service to interexchange carriers through the use of the unbundled local switch as contemplated by our rules [FN], because it fails to demonstrate that it is able to provide these carriers with the usage information necessary to bill for exchange access." **¶ 230** "We expect that when BellSouth next files a 271 application, it will have in place the necessary billing procedures, and that it will show that competing carriers are provided timely and accurate information necessary for competitive carriers to bill interexchange carriers, including BellSouth, for interLATA and intraLATA exchange access services." **¶ 231**
Checklist item 7- ----Directory Assistance	BellSouth is not providing nondiscriminatory access to directory assistance because it is not yet branding assistance as its competitors services. Moreover, BellSouth failed to provision orders properly. In	BellSouth must demonstrate that its method of branding results in nondiscriminatory access. **¶247** "BellSouth fails to demonstrate that it meets the requirements of the *Local Competition Second Report and Order* that it provide the

---Operator services	Tennessee, BellSouth misrouted calls to BellSouth's branded Operator Services and Directory Assistance platforms, despite the fact that the parties had provisioned and tested routing to AT&T's Operator Services and Directory Assistance platforms in six central offices in Tennessee. (Hamman, Dir. 21.) BellSouth does not provide nondiscriminatory access to operator services.	subscriber listing information in its directory assistance database in a way that allows competing carriers to incorporate that information into their own database. [FN] To comply with this requirement, a LEC, including a BOC, must provide a requesting carrier with all the subscriber listings in its operator services and directory assistance databases except listings for unlisted numbers." [FN] ¶ **249** BellSouth does not demonstrate that it provides access to its operator services and directory assistance in a nondiscriminatory manner. BellSouth submits performance data purportedly demonstrating nondiscriminatory access through two performance measurements: (1) the average time it takes to answer a customer's call to toll assistance and directory assistance; and (2) the percentage of calls answered within two time intervals, 30 seconds and 20 seconds. BellSouth has not separated the performance data between itself and competing carriers. The absence of an explanation [why performance data is not separated] precludes us from finding that BellSouth is providing access to its operator services and directory assistance that is consistent with our rules. ¶**245.**

BELLSOUTH COMPLIANCE WITH SECTION 271 CHECKLIST ITEMS

Checklist Item 11 – Number Portability	BellSouth has not provided evidence to demonstrate that it has met the federal Act's requirements regarding number portability.	"BellSouth does not demonstrate compliance with checklist item (xi)."¶ **276**
----Interim Number Portability	First, BellSouth has not yet finalized methods and procedures for interim and long-term number portability. Second, BellSouth has not developed a plan for transition of customers from interim number portability to the permanent solution. Third, although BellSouth has agreed to offer number portability through Route Indexing-Portability Hub ("RI-PH") to AT&T, it does not make this method of number portability generally available to CLECs in its SGAT.	"BellSouth does not demonstrate, however, that it is adequately coordinating unbundled loops with its provision of number portability. Consequently, it fails to demonstrate that it provides interim number portability so that 'users of telecommunications services [can] retain, at the same location, existing telecommunications numbers *without impairment of quality, reliability, or convenience* when switching from one telecommunications carrier to another'" [FN] ¶ **279**
	Despite repeated requests from AT&T, BellSouth has not specified how interim portability will work and in what timeframe it will be available. (Hamman, Dir. 46.)	"BellSouth does not make clear the period between the completion of the loop cutover and the start of the interim number portability provisioning." [FN] ¶ **281**
	BellSouth also has failed to provide billing information to AT&T to verify the successful completion of number portability tests. (Hamman, Dir. 46.) Without such billing information, AT&T cannot confirm the successful porting of its customers numbers. (*Id.*) Moreover, BellSouth's method for billing RI-PH will not provide AT&T the billing detail it needs to bill interexchange carriers ("IXCs") to terminate calls routed using RI-PH. BellSouth apparently has no intention of providing that information. The SGAT states that where the tandem provider is unable to provide necessary access information, it will: (1) bill the IXC directly the full terminating switched access charges; (2) keep the interconnection charge, tandem switching and a portion of transport; and (3) remit the local switching, a portion	"BellSouth also does not sufficiently demonstrate that competing carriers can access BellSouth's operations support systems to order and provision interim number portability efficiently." ¶ **285**

	of transport and CCL revenues to the other company. (SGAT Att. G, § K.) All of these options are unacceptable. Without billing information, AT&T is unable to verify that charges are accurate. (Hamman, Dir. 46)	
--- Long Term Number Portability	BellSouth has not provided details on how it plans to schedule or test the transition to permanent number portability. Absent more details, the TRA cannot approve the SGAT or find compliance with checklist item 11.	" In light of the fact that BellSouth is not yet obligated to provide long-term number portability in Louisiana, we find this evidence sufficient at this time to meet its obligations under checklist item (xi). In the future, however, we encourage section 271 applicants to provide more detailed information that more clearly addresses the items indicated in the Ameritech Michigan Order, and that does so specifically for the state that is the subject of its application." **¶ 292**
---- Cost Recovery	No evidence was provided on cost recovery.	"In any future application for in-region interLATA autority under section 271, BellSouth must demonstrate that it is complying with the Commission's rules on the pricing of long-term number portability." **¶294**
Checklist Item 12- Dialing Parity	Although nondiscriminatory access to operator services and directory assistance ("OS/DA") is technically feasible, as discussed under Issue 6, BellSouth has not demonstrated that it can provide selective routing which	BellSouth demonstrates that it provides nondiscriminatory access to such services as are necessary to allow a requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3).

	would permit CLEC customers to be routed directly to their providers' OS/DA. (Hamman, Dir. 37.) BellSouth also has not developed sufficient processes for the transition of AT&T's existing customers from BellSouth's OS/DA to AT&T's OS/DA. (*Id.*)	**¶296**
Checklist Item 13 - Reciprocal Compensation	BellSouth has not demonstrated that it can provide adequate reciprocal compensation arrangements. BellSouth has been absolutely silent on the terms and conditions by which it will provide reciprocal compensation to CLECs. BellSouth admitted in the hearing that it presently lacks the capability to provide CLECs detail on terminating usage. (Varner, Tr. v. 2, 107.) BellSouth maintains that the traffic of Internet service providers is not subject to reciprocal compensation, because BellSouth regards it as interstate traffic. (Varner, Dir. 108.) The FCC, however, has not excluded Internet service provider traffic from "local telecommunications traffic" entitled to reciprocal compensation under its regulations. *See* 47 C.F.R. § 51.701.	"Any future grant of in-region interLATA authority under section 271 will be conditioned on compliance with forthcoming decisions relating to Internet traffic in Louisiana." **¶ 303**
Checklist Item 14 – Resale ----- Resale conditions and limitations	BellSouth has not met the requirements of checklist item 14 because it does not provide nondiscriminatory access to OSS functions supporting resale. [2] In addition, BellSouth has not provided performance measurement data to demonstrate that it is providing parity treatment to CLECs. BellSouth's SGAT also fails to discuss the use of termination penalties for resold CSAs (Varner, Tr. v.2, 63-64) Such penalties are improper.	"Although BellSouth demonstrates that it makes its telecommunications services available for resale on terms and conditions consistent with our rules, it fails to demonstrate that its operations support systems provide access to resold services on a nondiscriminatory basis, . . . we therefore conclude that BellSouth fails to demonstrate that it meets the requirements of this checklist item. **¶319**.

[2] BellSouth's OSS deficiencies are discussed in the attached matrix, which is an updated version of a matrix previously filed with the TRA.

OPERATION SUPPORT SYSTEMS ISSUES

SC Order ¶	LA Order ¶	FCC	BellSouth	AT&T	FCC Louisiana II
¶¶104, 107	¶¶24-29	"In fact, according to the Department of Justice, 97 percent of BellSouth's residential orders and 81 percent of its business orders are processed without additional human intervention once the order is submitted by the BellSouth service representative." "The evidence in the record demonstrates that, in actual practice, the majority of orders submitted by competing carriers via the EDI interface do not mechanically flow through BellSouth's systems." "Moreover, the data show that these high rejection rates apply to all of the carriers using the EDI interface." "We believe that this substantial disparity between the flow-through rates of BellSouth's orders and those of competing carriers, on its face, demonstrates a lack of parity."		Paragraph added by AT&T. Approximately 40 percent of all CLEC EDI orders do not flow through BellSouth's systems without some degree of human intervention. (Bradbury 27-30; Bradbury Tr. v. 9 p. 193)	**¶ 107** "BellSouth fails to make a *prima facie* showing that it provides nondiscriminatory access to OSS ordering and provisioning functions. As in its previous applications, BellSouth fails to demonstrate that it has achieved parity in order flow-through."
¶ 105	¶ 26	"Evidence in the record suggests that, for example, AT&T and MCI must submit orders an average of 1.7 times before acceptance by BellSouth's systems, adding significant delay to the ordering process."		Paragraph added by AT&T. Because approximately 40 percent of all CLEC EDI orders do not flow through BellSouth's systems, CLECs must submit a large percentage of EDI orders more than once. (Bradbury 27-30; Bradbury Tr. v. 9 p. 193)	**¶ 107 above**

¶ 101-107	¶ 26-27	BellSouth does not notify competing carriers electronically that an order has been rejected due to errors.	Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998. (Stacy OSS Rebuttal, p. 33)	EDI Version 7.0 is only a partial solution to the problem of untimely reject notices because it does not provide fully automated reject/error notices for all types of errors for all types of services and products. For those types of errors not covered by EDI Version 7.0, such as directory listings, BellSouth will continue to use manual processes. Performance data, moreover, demonstrates that BellSouth is not providing rejection notices on a timely basis. (Bradbury 32-33)	**¶ 118-119** "Timely delivery of order rejection notices directly affects a competing carrier's ability to serve its customers, because such carriers are unable to correct errors and resubmit orders until they are notified of their rejection by BellSouth. In the *BellSouth South Carolina Order*, we concluded that BellSouth's manual provision of order rejection notices to competing carriers via facsimile failed to meet the standard of nondiscriminatory access." "BellSouth's data demonstrate that its performance on order rejections is deficient, and that our prior concerns with BellSouth's manual provision of order rejection notices were well-founded." "According to AT&T, BellSouth's data "suggest that more than 80 percent of rejection notices [that should be returned electronically] are re-keyed [manually] by BellSouth representatives and then transmitted to the [competing carrier]." "In May 1998, for electronically submitted orders for resale residential service, on average region-wide, BellSouth returned a reject notice 1.96 days after it received the order, if the notice was manually re-keyed. Over 37 percent of such notices were returned beyond a 24-hour interval." "We will look closely at the evidence in any future application to determine whether BellSouth has taken adequate steps to transition to an automated error notice process, and whether BellSouth's performance has improved with respect to the provision of timely and accurate error notices."

¶ 105.		"[T]he impact of the high order rejection rate is compounded because BellSouth does not notify competing carriers electronically that an order has been rejected."		Paragraph added by AT&T. Manual processes add costs, delays, and errors in performing OSS functions. Delays in BellSouth's processing of rejected orders adversely affect a CLEC's ability to meet customer due dates. (Bradbury 11, 23-24)	**¶ 118-119 above**

¶ 108-110	¶ 29-34	BellSouth does not provide credible evidence or explanation to substantiate its conclusions that reject errors are caused by competing carriers. Need further evidence as to causes of order errors to rule out that errors are caused from BellSouth's failure to provide information such as business rules.	Detailed analysis of orders is provided as part of Firm Order Commitment (FOC) analysis in BellSouth's service quality measurements (SQMs). (Exhibit WNS-OSS-4; Stacy OSS Rebuttal, pp. 65-66)	Rejections, in large part, are caused by the lack of inadequate system documentation, the lack of integratable interfaces, and the lack of electronic rejection notices. (Bradbury 11-16, 32-33).	**¶ 111-113** "In addition, BellSouth adjusts its flow-through data upward to account for competing carriers' errors based on its own analysis of the error type and party at fault but provides no evidentiary support for its conclusion. BellSouth provides further data on carrier errors on reply. Given the complexity of this data and the fact that interested parties have not had an opportunity to address it, we exercise our discretion to accord the information minimal weight." "We do not hold a BOC accountable for flow-through problems that are attributable to competing carriers' errors. In the *BellSouth South Carolina Order*, however, we rejected BellSouth's assertion that competing carriers' errors are the cause of its low EDI flow-through rates because BellSouth "d[id] not provide credible evidence or explanation" to support its assertion." "In this application, BellSouth again fails to provide supporting data or documentation to substantiate its conclusions until the reply round, despite our directions in the *BellSouth South Carolina Order* that BellSouth provide such information. Moreover, the data previously filed in this proceeding show that all carriers using the EDI interface are experiencing low flow-through rates. As in previous orders, we are unable to accept BellSouth's claims regarding competing carriers' errors in the absence of persuasive evidence to support such claims." "BellSouth's own data indicate that in a significant number of cases, the failure of orders to flow through BellSouth's order processing systems cannot be attributed solely to the errors of competing carriers." "Even if we accept BellSouth's analysis of competing carriers' errors, the data show that a significant number of EDI orders drop out for manual processing due to other reasons."

¶ 111		BellSouth must provide competing carriers with business rules on how its internal systems and databases process an order submitted via the EDI interface so that they can reduce errors.	BST provided LEO, LESOG, SOER rules on January 31, 1998. All rules for EDI Version 7.0 were also provided. (Stacy OSS Rebuttal, pp. 41-42, 58, 68)	BellSouth has provided an initial distribution of the bulk of required information, but BellSouth must continue to update the information to correct errors and omissions, and to reflect changes in the interfaces. BellSouth, moreover, has not yet implemented a change control process to provide timely notice of changes in business rules and other ordering documentation. (Bradbury 15-16)	**¶ 113** "As in prior orders, we are unable to determine how many of the errors that BellSouth ascribes to competing carriers result from BellSouth's underlying failure to provide adequate information, such as business rules, concerning how BellSouth's internal systems process orders. We are unable to make such a judgment because, as noted above and in prior orders, BellSouth provides no evidence supporting its claims regarding the causes of order errors."

¶ 112		Lack of integration between BellSouth interfaces for preordering and ordering functions has contributed to competing carriers order reject problems. BellSouth has not provided info to allow new entrant to integrate BellSouth's preordering and ordering interfaces.	CGI specs have been provided. EC-LITE available as well. (Stacy OSS Rebuttal, pp. 3-8, 11-14)	The LENS-CGI specification is neither complete nor current. More importantly, the LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. The EC-Lite interface probably is not economically efficient at this time for many CLECs. (Bradbury 13-14; Bradbury Tr. v. 9 p. 195-196)	**¶ 96, 98, 103** "BellSouth fails to demonstrate that its CGI-LENS and LENS interfaces provide nondiscriminatory access to OSS pre-ordering functions. In the *BellSouth South Carolina Order*, we concluded that BellSouth "impeded competing carriers' efforts to connect LENS electronically to their operations support systems and to the EDI ordering interface by not providing competing carriers with the necessary technical specifications and by modifying the types of data provided through the LENS interface." As a result, "unlike BellSouth's retail operation which uses an integrated pre-ordering/ordering interface, competing carriers [could not] readily connect electronically the LENS interface to either their operations support systems or to BellSouth's EDI interface for ordering, notwithstanding their desire to do so." "We cannot agree with BellSouth's argument that it addresses the issues raised in the *BellSouth South Carolina Order* and the *First BellSouth Louisiana Order* by making the CGI-LENS specifications available so that a competing carrier may integrate pre-ordering and ordering functions. At the outset, BellSouth's current CGI-LENS offering, unlike its prior version of CGI, is essentially similar to the HTML parsing that we rejected in the *BellSouth South Carolina Order* and the *First BellSouth Louisiana Order."* "We also reject BellSouth's reliance on the EC-Lite pre-ordering interface. BellSouth developed EC-Lite at the request of AT&T and made it available to other competing carriers in December 1997. We agree with the Department of Justice that "BellSouth does not report at all on the performance of its EC-Lite system . . . . and thus we cannot evaluate whether that interface is performing adequately."""

¶ 112	¶ 27	"We further find that the BellSouth's manual return of order rejection notices has contributed to competing carriers error rates. BellSouth's manual process for returning order rejection notices requires new entrants to manually enter error information from the faxed notice into the EDI interface. BellSouth's failure to integrate order rejection notices into the EDI interface also can be reasonably expected to contribute to errors committed by new entrants."		Paragraph added by AT&T. EDI Version 7.0 does not provide fully automated reject/error notices for all types of errors for all types of services and products. For those types of errors not covered by EDI Version 7.0, such as directory listings, BellSouth will continue to use manual processes. Manual processes add costs, delays, and errors in performing OSS functions. (Bradbury 9, 11, 32-33)	**¶ 118-119 above**
¶ 113		EDI-PC software does not provide adequate capability to check for errors before the order is submitted to BellSouth. BellSouth's retail systems include such order checking capabilities.	Additional edits were added to EDI-PC in Version 7.0. (Stacy OSS Rebuttal, pp. 53, 68)	EDI-PC is a stand-alone, proprietary software package developed by BellSouth's vendor and does not have edit capabilities that are equivalent to the edit capabilities of RNS. (Bradbury 26)	**Not addressed.**
¶ 114		"At the very least, these high rejection rates are evidence that the systems BellSouth has deployed still require considerable improvement before they may be used in a manner that provides nondiscriminatory access to competing carriers.		Paragraph added by AT&T. BellSouth's OSS do require considerable improvement to lower high rejection rates. BellSouth's OSS are not sufficiently documented. BellSouth has not provided adequate specifications, business rules, or training materials. BellSouth, moreover, has not implemented a change management control process and its software processes are immature. (Bradbury 15-16)	**¶ 113** "BellSouth has failed to correct other deficiencies previously identified as factors contributing to BellSouth's low flow-through rates. As in prior orders, we are unable to determine how many of the errors that BellSouth ascribes to competing carriers result from BellSouth's underlying failure to provide adequate information, such as business rules, concerning how BellSouth's internal systems process orders. We are unable to make such a judgment because, as noted above and in prior orders, BellSouth provides no evidence supporting its claims regarding the causes of order errors."

¶ 118 & ¶ 120		Manual provision of order rejection notices via fax is not equivalent access to what BellSouth provides its retail operations.	Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998. Data is provided on timeliness of error rejection notices. (Stacy OSS Rebuttal, p. 33; Exhibit WNSPM-1, p.5)	EDI Version 7.0 is only a partial solution to the problem of untimely reject notices because it does not provide fully automated reject/error notices for all types of errors for all types of services and products. For those types of errors not covered by EDI Version 7.0, such as directory listings, BellSouth will continue to use manual processes. Performance data, moreover, demonstrates that BellSouth is not providing rejection notices on a timely basis. (Bradbury 32-33)	**¶ 118-119 above**
8	¶¶ 32-34	"[T]he evidence in the record indicates that BellSouth does not provide competing carriers with [order error and rejection] notices in a timely manner."		Paragraph added by AT&T. The data available to AT&T indicates that BellSouth still is not providing reject/error notices on a timely basis. (Bradbury 32-33, Exhibit JMB-6)	**¶ 118-119 above**
¶ 118	¶ 33	"BellSouth, on the other hand, has supplied us with no comparative data indicating how long it takes BellSouth to receive the equivalent of an error notice for its own orders." "However, there is evidence that BellSouth's retail operations, depending on where the error occurs in its systems, receive the equivalent of an error notice between a few seconds to thirty minutes after entering an order."		Paragraph added by AT&T. BellSouth provides itself the retail analogue of reject/error notices through its internal electronic interface immediately during order preparation and between a few seconds to thirty minutes after releasing an order to Service Order Control System (SOCS). (Bradbury 32)	**¶ 118-119 above**

¶ 122	¶¶ 35-38	"We also find that BellSouth is not providing firm order confirmation (FOC) notices on a timely basis." "The Commission concluded [in the Ameritech Michigan Order] that the BOC needs to provide FOC notices to competing carriers in substantially the same time and manner that its retail operations receive the retail analogue." Citing to Ameritech Michigan Order at para 187 n. 479. "Evidence in the record suggests that the appropriate retail analogue for a FOC would be the time that elapses between when an Ameritech order is placed into the legacy systems and when the order is recognized as a valid order by the legacy systems. We believe that the BOC performs the functional equivalent of a "FOC" for itself even if it does not do so in an identical manner." Ameritech Michigan Order at para 187 n. 479.		Paragraph added by AT&T. AT&T still does not receive a large percentage of FOCs in substantially the same time that BellSouth receives the retail analogue. BellSouth obtains the retail analogue almost instantaneously. The FOC performance data that BellSouth has provided to AT&T, however, demonstrates that AT&T receives FOCs with 4 hours only for 50.7 percent of its orders, and within 24 hours for only 83.9 percent of its orders. This data, moreover, covers only those orders that are processed electronically. (Bradbury 31, Exhibit JMB-5; Bradbury Tr. v. 9 p. 193)	**¶ 120-123** "In its application, BellSouth submits performance data showing FOC timeliness, disaggregated by: (1) fully mechanized orders (*i.e.*, orders that flow through); (2) partially mechanized orders that are submitted electronically but require some manual processing; and (3) manually submitted and processed orders. After further consultation, BellSouth submits data that allow us to calculate an overall FOC timeliness figure for mechanized orders." "we agree with the Department of Justice that BellSouth's FOC performance continues to be deficient. For the month of May 1998, for electronically submitted orders for resale residential services, on average in Louisiana, BellSouth returned a FOC notice over 18 hours after it received a valid service order, and over 21 percent of such notices were returned beyond a 24-hour interval. The corresponding region-wide figures are 13 hours and over 13 percent. For April and March 1998, BellSouth's FOC performance data are similar to its May figures." "BellSouth again provides no data concerning its provision of equivalent information to its retail operations. We stated in the *BellSouth South Carolina Order* that "the retail analogue of a FOC notice occurs when an order placed by the BOC's retail operations is recognized as valid by its internal OSS." Yet BellSouth fails to provide any data in this regard. As we have done in two previous orders, we reject the argument that a BOC does not have a corresponding FOC notice for its retail operations."

¶ 123		BellSouth's application does not provide data on timeliness of delivery of FOC notices to competing carriers. In Ameritech order FCC directed BOCs to provide such information in subsequent applications.	FOC interval data delivered as part of BST's SQM proposal. (Stacy OSS Rebuttal, pp. 31-32; Exhibit WNSPM-1, p. 5)	The FOC performance data that BellSouth provided to AT&T demonstrates that AT&T receives FOCs within 4 hours only for 50.7 percent of its orders, and within 24 hours for only 83.9 percent of its orders. This data, moreover, covers only those orders that are processed electronically. (Bradbury 31, Exhibit JMB-5; Bradbury Tr. v. 9 p. 193)	**¶ 120-123 above**
¶ 125 & ¶ 129		Because BellSouth failed to provide this data comparing times to deliver FOCs with BellSouth's retail operations, BellSouth has not provided evidence to demonstrate that it is providing nondiscriminatory access.	Data furnished for CLECs. BST does not generate FOCs for its retail units. (Stacy OSS Rebuttal, pp. 31-32; Exhibit WNSPM-1, p. 5)	AT&T still does not receive a large percentage of FOCs in substantially the same time that BellSouth receives the retail analogue. BellSouth obtains the retail analogue almost instantaneously. The FOC performance data that BellSouth has provided to AT&T, however, demonstrates that AT&T receives FOCs within 4 hours only for 50.7 percent of its orders, and within 24 hours for only 83.9 percent of its orders. This data, moreover, covers only those orders that are processed electronically. (Bradbury 31, Exhibit JMB-5; Bradbury Tr. v. 9 p. 193)	**¶ 120-123 above**
	¶ 36	Need data on timeliness of delivery of FOC notices to competitive carriers and how long it takes to provide equivalent information to its retail operations. Need data for "numerous carriers over a specified period of time."	FOC interval data delivered as part of BST's SQM proposal. Data furnished for CLECs. BST does not generate FOCs for its retail units. (Stacy OSS Rebuttal, pp. 31-32; Exhibit WNSPM-1, p. 5)	AT&T still does not receive a large percentage of FOCs in substantially the same time that BellSouth receives the retail analogue. BellSouth obtains the retail analogue almost instantaneously. The FOC performance data that BellSouth has provided to AT&T, however, demonstrates that AT&T receives FOCs within 4 hours only for 50.7 percent of its orders, and within 24 hours for only 83.9 percent of its orders. This data, moreover, covers only those orders that are processed electronically. (Bradbury 31, Exhibit JMB-5; Bradbury Tr. v. 9 p. 193)	**¶ 120-123 above**

¶ 129	¶¶ 37-38	"[W]e are concerned that BellSouth has not included orders that require manual processing in its data on the return of FOC notices to competing carriers."	Not addressed by BellSouth – paragraph added by AT&T.	BellSouth does not provide AT&T with FOC performance data for orders that require some degree of manual processing, which is a significant percentage of all orders. If provided, it is likely that the percentage of FOCs received within 4 and 24 hours would be much lower than the corresponding percentages for fully electronic orders. (Bradbury 32)	**¶ 120-123 above**
¶ 131	¶ 40	Because BellSouth fails to provide order jeopardy notices for those delays caused by BellSouth, it is not providing competing carriers with nondiscriminatory access to OSS functions.	BellSouth provides jeopardy notices electronically to LENS users and by fax to EDI users. Electronic notification for EDI users will be submitted to the CLEC/BST Change Control Committee for development. (Stacy OSS Rebuttal, pp. 33-35)	BellSouth has not changed its processes for providing CLECs with jeopardy notices for BellSouth caused delays, despite the FCC concerns. Jeopardy notices for EDI orders still are manual. EDI is the ordering interface that BellSouth is relying on to demonstrate nondisciminatory access. The process for providing jeopardy notices for LENS orders is irrelevant for Section 271 purposes because BellSouth is not relying on the LENS ordering interface to demonstrate nondiscriminatory access to ordering and provisioning functions. (Bradbury 26, 33; Bradbury Tr. v. 9 p. 194)	**¶ 131-133** "We are pleased with BellSouth's progress in providing competing carriers with service jeopardy notification, but the data are insufficient to enable us to determine whether BellSouth is providing such notification in a nondiscriminatory manner." "BellSouth submits performance data on its provision of jeopardy notices to competing carriers for only a limited period, the month of May 1998. We will examine any future application closely for sufficient, reliable data to determine whether BellSouth provides jeopardy notices to competing carriers in a timely and accurate manner."

¶ 137-139	¶ 44	FCC insists on data that will permit it to determine the average interval from when BellSouth first receives an order to when BellSouth sends an order completion notice to the competing carrier.	SQM measures supply the data in the format agreed to by the DOJ. (Exhibit WNSPM-1, p. 10)	BellSouth has not provided data for the performance measurement described by the FCC. Even the data for the period between receipt of an order in SOCs until completion demonstrates that BellSouth provisioning services more quickly for its customers than for CLEC customers. (Bradbury 35)	**¶ 124-130** "BellSouth states that it measures the average installation interval "from [BellSouth's] receipt of a syntactically correct order from the [competing carrier] to [BellSouth's] actual order completion date."" "however, the data show that there is a significant disparity between the average installation intervals for competing carriers and for BellSouth's own retail operations. For resale residential service orders that do not require dispatch of a service technician, for instance, BellSouth's region-wide May 1998 average installation interval for competing carriers is 1.79 days, and for itself, 0.89 days. Corresponding figures for April 1998 are 1.63 days for competing carriers and 0.80 days for BellSouth, and for March 1998, 2.06 for competitors and 0.82 days for itself. These data consistently support a general conclusion that BellSouth provides service to competing carriers customers in twice the amount of time that it provides service to its retail customers. This is not equivalent access." "Three of BellSouth's performance measurements, when added together, measure the total interval of time between BellSouth's receipt of a valid service order and its issuance of a notice to the competing carrier that service has been installed: (1) FOC interval; (2) Average Installation Interval; and (3) Completion Notice Interval." "BellSouth does not provide analogous data on its retail operations for measurements (1) and (3), however, for purposes of comparison." "we expect that the disparity in BellSouth's provision of service, from the perspective of a competing carrier and that of its customer, may be significantly greater than suggested by the comparison set forth above of measurement (2), the Average Installation Interval data."

¶ 141		FCC does not base its decision on BellSouth's OSS functions for ordering and provisioning UNEs. BellSouth must demonstrate that it is offering nondiscriminatory access to OSS functions so as to enable competing carriers to submit orders for and obtain UNEs in a timely manner. For those OSS functions with no retail analogue, such as ordering and provisioning of UNEs, access to competing carriers must offer an efficient competitor a meaningful opportunity to compete.	Data for UNEs is presented in the SQM. (Exhibit WNSPM-1: Ordering pp. 5-6; Provisioning pp. 10-15; Maintenance pp. 17-19)	CLECs' ability to order UNEs electronically is very limited. CLECs can submit electronic orders for only three network elements using EDI and eight network elements using EXACT, and no combinations other than 2-wire analogue loop with INP (via EDI). Orders for network elements, moreover, take significantly longer to complete than orders for resold or retail services. Thus, CLECs using network elements as a competitive entry strategy are faced with significantly longer intervals to provide services when competing against BellSouth. (Bradbury 29, 35; Bradbury Tr. v. 9 p. 191-192)	**¶ 135-144** "Although BellSouth has improved its ordering systems for UNEs, we do not believe that it has made a *prima facie* case that its current OSS for ordering UNEs is nondiscriminatory. "BellSouth does not disaggregate competing LECs' flow-through orders for UNEs placed over the EDI interface. This level of disaggregation is necessary to evaluate whether BellSouth can process UNE orders placed over the EDI interface. In future applications, we expect BellSouth to address the degree of manual intervention for UNE orders and whether BellSouth's ordering interface for UNEs meets the nondiscriminatory requirement." "In addition, we conclude that BellSouth has not adequately supported its claim that its EDI interface has sufficient capacity to meet reasonably foreseeable demand." "In the absence of evidence of either adequate testing or commercial usage, we cannot conclude that BellSouth has demonstrated that its OSS for ordering UNEs is in compliance with our rules." "In future applications, we expect BellSouth to explain clearly the method by which competitive carriers can order UNEs that the competitive LECs plan to combine at cost-based rates under section 252(d)(1)." "We find that BellSouth fails to demonstrate that the ordering process it offers to competitive LECs for interim number portability, complex directory listings, and split accounts meets the nondiscriminatory requirement." "We expect that, in any future application, BellSouth will demonstrate that the ordering process it offers to competitive LECs meets the nondiscriminatory requirement. In particular, BellSouth should provide evidence that it offers

¶ 142-43		"At the time of its application, BellSouth stated that no competing carriers were submitting orders for unbundled network elements through the EDI interface, although several carriers indicated their interest in using EDI. As competing carriers transition to EDI, BellSouth's preferred ordering interface, we are concerned that competing carriers may face the same problems with the EDI interface that carriers have experienced with orders for resale. These problems include high rejection rates and untimely order status notices." "We are also concerned about the level of manual processing involved in the ordering and provisioning of unbundled network elements."		Paragraph added by AT&T. CLECs' ability to order UNEs electronically is very limited. CLECs can submit electronic orders for only three network elements using EDI and eight network elements using EXACT, and no combinations other than 2-wire analogue loop with INP (via EDI). Orders for network elements, moreover, take significantly longer to complete than orders for resold or retail services. Thus, CLECs using network elements as a competitive entry strategy are faced with significantly longer intervals to provide services when competing against BellSouth. (Bradbury 29, 35; Bradbury Tr. v. 9 p. 191-192)	**¶ 110** "Given that these data represent the EDI flow-through performance for a relatively low number of orders, we also believe that the problems BellSouth is experiencing will worsen as order volumes, and the number of complex orders for services other than POTS, increase. Although we noted in previous orders that there may be limited instances in which manual processing is appropriate, we also found that excessive reliance on manual processing, especially for routine transactions, impedes the BOC's ability to provide equivalent access."
¶ 144		BellSouth expected to provide a detailed explanation of the actions it has undertaken to transition to an automated process, and to demonstrate that it is able to process orders for and provision UNEs in a timely and accurate manner at both current and projected levels of demand from competing carriers.	Electronic ordering with electronic service order generation for loops, ports, interim number-portability (INP) and all available combinations listed in SGAT except loop distribution with NID available since November, 1997. (Stacy OSS Rebuttal, pp. 29-30) Data for ordering and provisioning UNEs is presented in the SQM. (See ¶ 141 above).	CLECs' ability to order UNEs electronically is very limited. CLECs can submit electronic orders for only three network elements using EDI and eight network elements using EXACT, and no combinations other than 2-wire analogue loop with INP (via EDI). Orders for network elements, moreover, take significantly longer to complete than orders for resold or retail services. Thus, CLECs using network elements as a competitive entry strategy are faced with significantly longer intervals to provide services when competing against BellSouth. (Bradbury 29, 35; Bradbury Tr. v. 9 p. 191-192)	**¶ 135-141 above**

145 & 146		"An additional concern is whether BellSouth has deployed the necessary OSS functions to allow competing carriers to order network elements in a manner that allows them to be combined." BellSouth, however, submits no evidence of its ability to provide OSS functions that support the ordering and provisioning of these combination of network elements." "BellSouth further indicates that is has not yet undertaken development of OSS that could process orders for combinations of network elements." "In addition, we are troubled by allegations in the record with respect to BellSouth's ability to coordinate orders for separate unbundled network elements so that a carrier may combine them."		Paragraph added by AT&T. CLECs' ability to order UNEs electronically is very limited. CLECs can submit electronic orders for only three network elements using EDI and eight network elements using EXACT, and no combinations other than 2-wire analogue loop with INP (via EDI). Orders for network elements, moreover, take significantly longer to complete than orders for resold or retail services. Thus, CLECs using network elements as a competitive entry strategy are faced with significantly longer intervals to provide services when competing against BellSouth. (Bradbury 29, 35; Bradbury Tr. v. 9 p. 191-192)	**¶ 135-141 above**
¶ 146		BellSouth expected to submit evidence to demonstrate that both individual UNEs and those elements that BellSouth offers in combination can be ordered and provisioned in an efficient, accurate and timely manner, and that its OSS are designed to accommodate both current and projected demand for UNEs and combinations of UNEs.	Electronic ordering with electronic service order generation for loops, ports, interim number-portability (INP) and all available combinations listed in SGAT except loop distribution with NID available since November, 1997. (Stacy OSS Rebuttal, pp. 29-30) Data for ordering and provisioning UNEs is presented in the SQM. (Putnam Exhibit JWP-1, Appendix A, p. 5)	CLECs' ability to order UNEs electronically is very limited. CLECs can submit electronic orders for only three network elements using EDI and eight network elements using EXACT, and no combinations other than 2-wire analogue loop with INP (via EDI). Orders for network elements, moreover, take significantly longer to complete than orders for resold or retail services. Thus, CLECs using network elements as a competitive entry strategy are faced with significantly longer intervals to provide services when competing against BellSouth. (Bradbury 29, 35; Bradbury Tr. v. 9 p. 191-192)	**¶ 135-141 above**

¶ 162, 163	¶¶ 49, 53-55	"As for BellSouth's second proposed method for electronically connecting LENS to a new entrant's operations support systems -- development of a software program that utilizes the information underlying each LENS presentation screen -- we find convincing evidence in the record that use of this method would not provide equivalent access to OSS functions for pre-ordering." "[T]he competing carrier would only be able to download information from LENS one screen at a time, thereby resulting in a slower, less efficient process to connect LENS to the competing carrier's operations support systems that would be available through either CGI or a machine-to-machine interface." "[E]vidence in the record indicates that BellSouth has made changes to LENS that would impede the ability of a carrier to develop and use a software program to extract the data underlying each LENS screen." "[A] carrier that develops a software program to extract information from each LENS screen would to expend additional resources each time BellSouth makes a significant change in order to update the program to accommodate those changes."		Paragraph added by AT&T. The LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. (Bradbury 14; Bradbury Tr. v. 9 p. 195)	**¶ 98 above**
¶ 164	¶ 54	"We further note that a number of parties also contend that BellSouth has not kept them adequately informed of changes to its OSS functions."		Paragraph added by AT&T. BellSouth has not yet implemented a change management process that provides CLECs with sufficient advance notice of changes. (Bradbury 10, 15-16)	**Not addressed.**

¶ 155 & ¶ 161		BellSouth has not provided necessary technical specifications, such as updated and complete CGI specs.	Updated CGI specs provided December 15, 1997 and were further updated with EDI Version 7.0 released March 16, 1998. (Stacy OSS Rebuttal, pp. 5-6)	The LENS-CGI specification is neither complete nor current. More importantly, the LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. (Bradbury 13-14; Bradbury Tr. v. 9 p. 195-196)	**¶ 98 above**
¶ 156	¶ 55	New entrants using LENS cannot readily transfer information electronically from LENS to their OSS to integrate preordering and ordering systems. In contrast, BellSouth's retail operation uses an integrated preordering and ordering interface.	Integratable interfaces CGI and EC-LITE and EDI have been provided to the CLECs. (Stacy OSS Rebuttal, pp. 5-12)	The LENS-CGI specification is neither complete nor current. More importantly, the LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. The EC-Lite interface probably is not economically efficient at this time for many CLECs. (Bradbury 13-14; Bradbury Tr. v. 9 p. 195-196)	**¶ 96, 98, 103 above**
	¶ 49	Competing carriers cannot readily connect electronically the LENS interface to their OSS or to the EDI interface. BellSouth's own retail operations use an integrated pre-ordering/ordering system.	Integratable interfaces CGI and EC-LITE and EDI have been provided to the CLECs. (Stacy OSS Rebuttal, pp. 5-12)	The LENS-CGI specification is neither complete nor current. More importantly, the LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. The EC-Lite interface probably is not economically efficient at this time for many CLECs. (Bradbury 13-14; Bradbury Tr. v. 9 p. 195-196)	**¶ 96, 98, 103 above**

	¶ 54	BellSouth has not met its obligation to provide complete, detailed and updated specifications that competing carriers need to use CGI to electronically connect their OSS to BellSouth's interface.	Updated CGI specs provided December 15, 1997 and were further updated with EDI Version 7.0 released March 16, 1998. (Stacy OSS Rebuttal, pp. 5-12; Exhibit WNOSS-1)	The LENS-CGI specification is neither complete nor current. More importantly, the LENS-CGI specification will not provide nondiscriminatory access because BellSouth decided to develop a specification that utilizes the Hyper Text Markup Language (HTML) presentation data stream. The FCC has found that an integration method that involves HTML presentation data stream would not provide nondiscriminatory access. (Bradbury 13-14; Bradbury Tr. v. 9 p. 195-196)	**¶ 96, 98, 103 above**
7-168	¶ 57-58	The actual due date for orders is not assigned by LENS but rather after order goes through SOCS. Because of reject problems, new entrants cannot be confident that the due date they tell the customer will be the actual due date. The relevant CO or work center may no longer be accepting orders by time they get the order correct and get it through SOCS. Problem can be ameliorated by correcting the deficiencies in its ordering systems and by providing equivalent access to OSS functions through its current systems.	BST provided LEO, LESOG, SOER rules on January 31, 1998. All rules for EDI Version 7.0 were also provided. (Stacy OSS Rebuttal, p. 68) Electronic reject notification implemented with EDI Version 7.0 on March 16, 1998. (Stacy OSS Rebuttal, p. 33)	BellSouth's internal interfaces (RNS and SONGS) have due date calculation capability but BellSouth CLEC OSS pre-ordering interfaces (LENS Inquiry Mode and EC-Lite) do not have a due date calculation capability. Several other factors compound the problems associated with the lack of a calculated due date, such as BellSouth's refusal to allow CLECs to reserve due dates, untimely FOCs, high reject rates, and inability to meet target intervals. For all of these reasons, it is nearly impossible for CLECs to offer its customers the same due dates with an equivalent level of confidence in that due data as BellSouth can offer to its customers. (Bradbury 22-24; Bradbury Tr. v. 9 p. 191)	**¶ 104-106** "We find that BellSouth still fails to offer nondiscriminatory access to due dates, for the reasons set forth in the *BellSouth South Carolina Order* and the *First BellSouth Louisiana Order*." "We also note that, pursuant to an order by the Georgia Commission, BellSouth will add an automatic due date calculation capability to LENS and CGI-LENS beginning in November 1998. Until then, LENS requires competing carriers to calculate due dates manually. Although we must confine our analysis in this order to BellSouth's operations support systems at the time of the application, we will closely examine BellSouth's automatic due date calculation capability in any future application."

¶ 170		FCC does not decide whether the method of calculating due date in LENS is discriminatory. However, BellSouth retail reps are provided with next available due dates that are automatically calculated while new entrants in inquiry mode of LENS are required to determine whether a premises visit is required and to calculate a due date manually.	Due date information is provided through LENS, LENS-CGI, and EC-LITE. Rules for the CLECs to incorporate calculations similar to RNS in these systems have been provided. (Stacy OSS Rebuttal, pp. 23-26)	BellSouth's internal interfaces (RNS and SONGS) have due date calculation capability but BellSouth CLEC OSS pre-ordering interfaces (LENS Inquiry Mode and EC-Lite) do not have a due date calculation capability. Several other factors compound the problems associated with the lack of a calculated due date (e.g., no reserved due dates, untimely FOCs, high reject rates, and missed completion intervals). Consequently, it is nearly impossible for CLECs to offer its customers the same due dates with an equivalent level of confidence in that due data as BellSouth can offer to its customers. (Bradbury 22-24; Bradbury Tr. v. 9 p. 191)	**¶ 104-106 above**

¶¶ 171-72		"LENS in the [inquiry] mode requires a competing carrier to determine whether a premises visit is required and to calculate a due date manually. In contrast, BellSouth's retail service representatives are provided with next-available due dates that are automatically calculated based on the services on a particular order, the work that must be performed, and the availability of the work force for the area. Although BellSouth does not contest this apparent lack of parity in access to calculated due dates when LENS is used in the inquiry mode, BellSouth responds that competing carriers can obtain calculated due dates in the same manner as BellSouth representatives simply by using LENS in the firm order mode, rather than in the inquiry mode. A number of competing carriers contend to the contrary, arguing that the use of this mode for pre-ordering leads to several problems." "We note that BellSouth's retail operation does not face these same problems, because its pre-ordering and ordering functions are integrated."		Paragraph added by AT&T. BellSouth's internal interfaces (RNS and SONGS) have due date calculation capability but BellSouth CLEC OSS pre-ordering interfaces (LENS Inquiry Mode and EC-Lite) do not have a due date calculation capability. (Bradbury 22-24; Bradbury Tr. v. 9 p. 191)	**¶ 104-106 above**
¶ 173		FCC concerned about evidence in the record that BellSouth sent September 2, 1997 letter that describes a problem with LENS giving accurate due dates for some types of orders. No update has been sent.	Problem was corrected in November, 1997. (G. Calhoun OSS Direct, pp. 35-38)		**Not addressed.**

¶ 174		FCC concerned by allegation that LENS user must scroll through lengthy list of available products and services and a random listing of numerous IXCs to find one.	P/SIMS download, CGI and EC-LITE are now available so CLECs can develop this capability. (Stacy OSS Rebuttal, pp. 20-21)	BellSouth's RNS has search capability for both product/features and PIC code lists. LENS does not have this capability. CLECs, moreover, cannot reasonably add this capability to the "LENS-CGI" specification because "LENS-CGI" uses a HTML presentation data stream. The LENS-CGI specification would require a CLEC to "call" BellSouth's database approximately 30 times to obtain the entire list of either product/features or PIC codes because the LENS-CGI specification only allows CLECs to obtain 10 entries at a time. (Bradbury 14, 25)	**¶ 96, 98, 103 above**
¶ 175		"In addition, the Department of Justice and several carriers contend, and the Florida Commission found, that a competing carrier using LENS in the inquiry mode must validate a customer's address prior to accessing each pre-ordering function."		Paragraph added by AT&T. LENS does not provide direct access to the desired pre-ordering function. In the inquiry mode, CLECs must validate the address before performing each other pre-ordering function. In the view all and firm order mode, CLECs are tied to a sequential process. BellSouth does not provide CLECs with the capability to access any pre-ordering function in LENS in whatever order suits the CLECs business needs. (Bradbury 25).	**Not addressed.**
¶ 179		Limit of 100 numbers or 5% of numbers per central office should be removed.	Restriction was removed in January 1998. (OSS p. 6)	BellSouth removed those restrictions, but still limits CLECs using LENS to reserving 6 numbers at a time, twice per session. RNS allows BellSouth to reserve up to 25 telephone numbers at a time. (Bradbury 25)	**Not addressed.**
¶ 180		FCC notes CLECs' allegations that LENS locks up.	Problem was fixed with December 12, 1997 software release. (Putnam Exhibit JWP-1, Appendix A, p. 12)	BellSouth has not demonstrated that LENS has adequate capacity because the projected volumes and testing methodology was seriously flawed. BellSouth's capacity testing did not include a peak busy hour test to determine whether LENS would lock up under heavy use. (Bradbury 17-18).	**Not addressed.**

181		FCC encourages BellSouth to continue to work with competing carriers to ensure that LENS has adequate capacity.	LENS volume testing has continued. Support for 300 users is in production and additional capability is available. (Putnam Exhibit JWP-1, Appendix A, p. 12)	BellSouth has not demonstrated that LENS has adequate capacity because the projected volumes and testing methodology was seriously flawed. BellSouth's capacity testing did not include a peak busy hour test to determine whether LENS would lock up under heavy use. (Bradbury 17-18).	**Not addressed.**