W. Keith Milner

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 97-00309

April 26, 2002

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Assistant Vice President - Interconnection Operations for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 31 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I graduated from Georgia State University in 1992 with a Master of Business Administration degree.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION?

A. I have testified before the state Public Service Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South Carolina, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission on the issues of technical capabilities of the switching and facilities network, the introduction of new service offerings, expanded calling areas, unbundling, and network interconnection.

Q. HOW IS YOUR TESTIMONY ARRANGED?

A. My testimony is divided into the following sections:

Part A: Executive Summary: Pages 3 to 13.

The Executive Summary Section contains an overview of the network-related offerings BellSouth makes available to Competitive Local Exchange Carriers ("CLECs") through BellSouth's approved interconnection agreements and Statement of Generally Available Terms and Conditions ("SGAT").

Part B: Comprehensive Discussion of the Availability of Network-Related Offerings to CLECs: Pages 14 to 11.

Part B contains an extensive discussion of the availability of required offerings in Authority-approved interconnection agreements.

PART A: EXECUTIVE SUMMARY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my testimony is to document the means by which BellSouth satisfies the network-related requirements of the Competitive Checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 ("Act"). In doing so, I will describe the network-related offerings that BellSouth makes available to CLECs in Tennessee through BellSouth's approved interconnection agreements and SGAT.

Q. WHAT WILL YOUR TESTIMONY DEMONSTRATE?

A. My testimony will demonstrate that BellSouth currently is in compliance with all the network-related requirements of the competitive checklist. Moreover, I will show that BellSouth has a legal obligation to provide required offerings in Authority-approved interconnection agreements. In addition to the interconnection agreements cited herein, Exhibit JAR-3 attached to the testimony of John Ruscilli sets forth the citations to various interconnection agreements that evidence BellSouth's legally binding obligations to provide the network-related requirements of the competitive checklist. BellSouth refers the Authority to Exhibit JAR-3 as evidence of BellSouth's checklist compliance.

Q. WHERE CAN THE AUTHORITY FIND ADDITIONAL TECHNICAL INFORMATION ON THE OFFERINGS DISCUSSED HEREIN?

A. BellSouth provides detailed administrative information, technical information, and

procedures for ordering facilities and services in a number of guides, technical service descriptions, and manuals, all of which are available on BellSouth's Internet website at (http://www.interconnection.bellsouth.com/guides/index.html) and (http://www.interconnection.bellsouth.com/products/tech_ref.html). These websites are available to the Authority should the Authority desire additional detail on the offerings discussed herein.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 1: INTERCONNECTION?

A. As of February 28, 2002, BellSouth had provisioned 44,999 trunks interconnecting its network with the networks of CLECs in Tennessee (that is, trunks from CLECs' switches to BellSouth's switches). In its nine-state region, BellSouth had installed 466,877 trunks from CLECs' switches to BellSouth's switches as of that same date. As of February 28, 2002, BellSouth had provided 266,534 two-way trunks (including transit trunks) to a total of 100 CLECs across BellSouth's nine-state region. In Tennessee, as of that same date, BellSouth has provided 22,772 two-way trunks (including transit trunks) to 30 CLECs who also have ordered and been provided trunk groups to BellSouth's local tandem switches.

In Tennessee, as of February 28, 2002, BellSouth had completed 476 physical collocation arrangements, with two (2) in progress, for over 30 different CLECs, of which 291 are cageless physical collocation arrangements. Physical collocation arrangements were established in 59 different central offices out of a total of 196 BellSouth central offices in Tennessee as of February 28, 2002. As of February 28, 2002, there were 4,121 physical

collocation arrangements in place for CLECs throughout BellSouth's nine-state region. Of these, 2,581 were cageless physical collocation arrangements. Throughout BellSouth's region, an additional 23 physical collocation arrangements were in progress for 11 different CLECs as of February 28, 2002.

In Tennessee, as of February 28, 2002, there was one (1) virtual collocation arrangement in progress and there were 11 virtual collocation arrangements in service located in 11 different BellSouth central offices. Those central offices are located in eight (8) cities in Tennessee. Across BellSouth's nine-state region, over 40 different CLECs requested and BellSouth provided 422 virtual collocation arrangements with construction of an additional 12 arrangements underway as of February 28, 2002.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS?

A. As of February 28, 2002, BellSouth had provided 53,370 loop and port combinations to CLECs in Tennessee and 727,624 such combinations were in place for CLECs across BellSouth's nine-state region. In addition, BellSouth had 514 loop and transport combinations called Enhanced Extended Links ("EELs") in place for CLECs in Tennessee.

BellSouth has also installed over 175 access terminals to CLECs in its nine-state region for the purpose of providing access to sub-loop elements. To date, no CLEC has requested the provisioning of an access terminal in Tennessee. BellSouth stands ready to

provide access terminals to CLECs in Tennessee upon request.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. As of March 6, 2002, CLECs in Tennessee had executed with BellSouth 55 license agreements and 109 license agreements region-wide, (both state-specific agreements and multi-state agreements) that allow those CLECs to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 670 requests in Tennessee for access to poles, ducts, conduits, and rights-of-way from 17 CLECs with no request being denied.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 4: LOCAL LOOP?

A. As of February 28, 2002, in Tennessee, BellSouth had provided 1,601 two-wire Asymmetrical Digital Subscriber Lines ("ADSL") loops and 53 two-wire High Bit-rate Digital Subscriber Line ("HDSL") loops to over ten (10) different CLECs in Tennessee. As of the same date, BellSouth had provisioned within its region 16,750 two-wire ADSL loops, 443 two-wire HDSL loops, and 65 four-wire HDSL loops to over 30 different CLECs.

While CLECs in Tennessee have not purchased the unbundled sub-loop element referred to as loop distribution, BellSouth has provided 568 unbundled loop distribution pairs to

CLECs across BellSouth's nine-state region as of February 28, 2002. BellSouth stands ready to provide sub-loop elements to CLECs in Tennessee upon request.

BellSouth has no dark fiber arrangements in place in Tennessee because none have been requested. BellSouth, however, has provided a total of 22 dark fiber arrangements in two (2) other states within BellSouth's nine-state region. BellSouth stands ready to provide dark fiber arrangements to CLECs in Tennessee upon request.

As of February 28, 2002, BellSouth had provisioned 6,521 line sharing arrangements across BellSouth's nine-state region and 727 line sharing arrangements in Tennessee.

From January 2001 through January 2002, CLECs made 54,646 mechanized Loop Makeup ("LMU") inquiries region-wide. In Tennessee, CLECs made 3,864 mechanized LMU inquiries. From November 2000 through January 2002, CLECs made 2,280 manual LMU inquiries region-wide, including 80 in Tennessee.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 5: LOCAL TRANSPORT?

A. As of February 28, 2002, BellSouth had provided 1,351 dedicated local transport trunks to CLECs in Tennessee. BellSouth has provided 11,972 dedicated local transport trunks to CLECs in its nine-state region as of that same date.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 6: LOCAL SWITCHING?

A. As of February 28, 2002, BellSouth had provided 13 unbundled switch ports to CLECs in Tennessee. Region-wide, BellSouth had 258 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 53,370 switch ports in service for CLECs in Tennessee and 727,624 in service for CLECs across BellSouth's region.

BellSouth offers two methods of customized routing to CLECs: Advanced Intelligent Network ("AIN") and Line Class Codes ("LCC"). BellSouth has tested both methods and both currently are available.

To date, no CLEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request. BellSouth has provided the LCC method of customized routing to one CLEC in Georgia. No CLEC in Tennessee has requested this method of customized routing; BellSouth, however, stands ready to provide it.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION?

A. As of February 28, 2002, CLECs had requested and BellSouth had provided 452 E911 trunks for CLECs in Tennessee. In its nine-state region, BellSouth had 5,156 trunks in service connecting CLECs' switches with BellSouth's E911 arrangements as of that same date. In Tennessee, 25 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of February 28, 2002; and in BellSouth's nine-state

region, 68 CLECs were doing so as of that same date.

As of February 28, 2002, CLECs in Tennessee had 398 directory assistance trunks in place between those CLECs' switches and BellSouth's Directory Assistance ("DA") platform. In BellSouth's nine-state region, there were 3,085 such directory assistance trunks in place serving CLECs. In BellSouth's nine-state region, 38 CLECs were purchasing Directory Assistance Access Service ("DAAS") and 33 CLECs were purchasing Directory Assistance Call Completion ("DACC") service from BellSouth as of February 28, 2002.

As of February 28, 2002, five (5) service providers were using BellSouth's Tennessee subscriber listings, via Directory Assistance Database Service ("DADS"), to provide DA service and third party listing data to end users. Ten service providers were using DADS across BellSouth's nine-state region as of that same date. As of February 28, 2002, two (2) service providers in the region were using Direct Access to Directory Assistance Services ("DADAS") to provide the service to CLECs.

As of February 28, 2002, BellSouth had provided CLECs in Tennessee with 440 operator services trunks. Across its nine-state region, BellSouth had provided CLECs with 3,091 operator services trunks as of that same date. In Tennessee, BellSouth had provided CLECs with 47 verification trunks as of February 28, 2002. Across its nine-state region, BellSouth had provided CLECs with 464 verification trunks as of that same date. BellSouth offers four service levels of branding to CLECs when CLECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branded; unbranded; custom branded; and self-branded. Unbranded, custom branded, and self-

branded are all provided via customized routing (sometimes referred to as "selective routing"), which includes the LCC and AIN service offerings. BellSouth also offers Originating Line Number Screening ("OLNS") customized routing, which provides BellSouth branded, unbranded, and customized branded of Directory Assistance and/or Operator Call Processing. BellSouth's OLNS is deployed in Tennessee and throughout BellSouth's nine-state region.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 8: WHITE PAGES LISTINGS?

A. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which CLECs may obtain such listings are business as usual for BellSouth.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 9: NUMBER ADMINISTRATION?

A. At this time, BellSouth no longer performs the central office code assignment function. NeuStar assumed all North American Numbering Plan Administrator ("NANPA") responsibilities on November 17, 1999, when the FCC approved the transfer of Lockheed-Martin's Communications Industry Service division to NeuStar.

As to its responsibilities, BellSouth has responded to CLEC concerns about accurate and

timely activation of central office codes ("NXXs") by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to CLECs and independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If a CLEC or independent LEC intends to interconnect its network directly with BellSouth's network, or if interconnection arrangements with BellSouth are already in place, the CLEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its Central Office Code Request to the NANPA (NeuStar). If the CLEC gives BellSouth a copy of its Central Office Code Request, BellSouth is better able to coordinate activation of the Central Office Code in BellSouth's network.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING?

A. BellSouth's signaling service is available as evidenced by the fact that 15 CLECs had directly connected to BellSouth's signaling network in Tennessee as of January 31, 2002.

BellSouth's region-wide Line Information Database ("LIDB") processed more than 1.8 billion queries from CLECs and others during the period from January 1997 through January 2002. As of February 28, 2002, BellSouth had over 100 Calling Name ("CNAM") database customers, consisting of both CLEC and independent LECs, across BellSouth's nine-state region.

BellSouth has offered independent LECs and other service providers access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through February 2002, CLECs and other service providers across BellSouth's nine-state region completed over 17 billion queries of BellSouth's Toll Free Number database.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY?

A. BellSouth ported 47,754 lines in Tennessee using Interim Number Portability ("INP"). However, as of February 28, 2002, BellSouth had converted 46,480 (97%) of those lines to Local Number Portability ("LNP"). In its region, BellSouth ported 117,010 numbers using interim number portability, of which 110,677 (95%) have been converted to LNP as of that same date.

As of February 28, 2002, BellSouth had ported 276,197 business directory numbers and 1,166 residence directory numbers in Tennessee using LNP. In its nine-state region, BellSouth had ported 1,749,256 business and 197,254 residence directory numbers as of February 28, 2002, which confirms the availability of LNP.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 12: LOCAL DIALING PARITY?

A. BellSouth's interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC. While BellSouth is unable to determine the full extent of CLEC dialing policies, BellSouth is not aware of any complaints from CLEC customers that they are required to dial any access codes or additional digits to complete local calls.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 13: RECIPROCAL COMPENSATION?

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. Reciprocal compensation is discussed further in the testimony of John Ruscilli.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 14: RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT?

A. As of February 28, 2002, there were over 80 CLECs reselling BellSouth's local services to over 40,000 customer lines in Tennessee.

PART B: COMPREHENSIVE DISCUSSION OF THE AVAILABILITY OF NETWORK-RELATED OFFERINGS TO CLECs.

CHECKLIST ITEM 1: INTERCONNECTION

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 1.

A. According to the Federal Communications Commission ("FCC"), interconnection refers "to the physical linking of two networks for the mutual exchange of traffic." *Local Competition Order*, ¶ 176. Checklist Item 1 obligates BellSouth to provide CLECs access to points of interconnection that are equal in quality (as defined by 47 C.F.R. § 51.331) to what BellSouth provides itself, and that meet the same technical criteria and standards used in BellSouth's network for a comparable arrangement, except where a CLEC requests otherwise. 47 U.S.C. § 251(c)(2)(C) and (D) and 47 C.F.R. § 51.305(a)(3), (4).[1] As detailed below, BellSouth's interconnection agreements and its Tennessee SGAT fully satisfy this mandate.

Checklist Item 1 has three (3) requirements. First, BellSouth must provide interconnection at any technically feasible point in the carrier's network. Second, BellSouth must provide CLECs with interconnection that is at least equal in quality to

[1] Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 96-98 & 95-185, 11 FCC Rcd 15499, 15614 (1996) ("Local Competition Order"), modified on recon., 11 FCC Rcd 13042 (1996), vacated in part on other grounds sub nom. Iowa Utils. Bd. V. FCC, 120 F. 3d 753 (8th Cir. 1997), cert. granted sub nom. AT&T Corp. v. FCC, 118 S. Ct. 879 (1998).

that provided by BellSouth to itself. Third, BellSouth must provide interconnection on rates, terms and conditions that are just, reasonable and nondiscriminatory.

POINTS OF INTERCONNECTION

Q. DOES BELLSOUTH PROVIDE INTERCONNECTION AT ANY TECHNICALLY FEASIBLE POINT?

A. Yes. Local interconnection is available at any technically feasible point in BellSouth's network, including meet point interconnection arrangements, on terms and conditions that are just, reasonable and nondiscriminatory. 47 U.S.C. § 251(c)(2); 47 C.F.R. § 51.305(a)(2). Consistent with FCC rules, BellSouth makes interconnection available at the following points: line-side of the local end office switch; trunk-side of the local end office switch; trunk interconnection points for local end office and tandem switches; central office cross-connect points; out-of-band signal transfer points; and the points of access to unbundled elements. CLECs have the option to interconnect at one or more technically feasible point in each LATA. *See* Interconnection Agreement Between BellSouth and NewSouth Communications, Corp. ("NewSouth Agmnt.") Att. 3, § 1.2. In cases in which dual entrance points are available in a given central office building, and space is available, BellSouth will make dual entry facilities available to CLECs. *See* NewSouth Agmnt., Att. 4, § 5.2.1. Moreover, a CLEC may request, via the Bona Fide Request ("BFR") process, to utilize another interconnection point when it is determined to be technically feasible.[2] *See* Interconnection Agreement Between BellSouth and

[2] The BFR process, and the intervals associated with it, are addressed in the testimony of John Ruscilli.

Knology ("Knology Agmnt."), Att. 3, § 1.1. BellSouth will provide ordering and provisioning of interconnection services that is equal to the ordering and provisioning services BellSouth provides to itself. *See* NewSouth Agmnt., Att. 6, § 1.1.

MEANS OF INTERCONNECTION

Q. WHAT MEANS OF INTERCONNECTION DOES BELLSOUTH OFFER?

A. BellSouth offers the following means of interconnection: (1) physical collocation; (2) virtual collocation; (3) assembly point arrangements; (4) fiber optic meet arrangements; and (5) interconnection via purchase of facilities from the other party. SGAT, § I.C. BellSouth provides equal-in-quality interconnection on terms and conditions that are just, reasonable, and nondiscriminatory in accordance with the requirements of Sections 251(c)(2) and 252(d)(1). Moreover, a CLEC may request, via the BFR process, to utilize another means of interconnection when it is determined to be technically feasible.

Q. DESCRIBE MULTIPLE TANDEM ACCESS ("MTA").

A. BellSouth MTA offering provides for LATA-wide BellSouth transport and termination of CLEC-originated local and BellSouth transported intraLATA traffic by establishing a Point of Interconnection at a BellSouth access tandem with routing through multiple BellSouth access tandems as required. The terms and conditions for such offering are set forth in interconnection agreements. *See* e.g., NewSouth Agmnt., Att. 3, §1.9.

INTERCONNECTION TRUNKS

Q. DESCRIBE THE TRUNKING ARRANGEMENTS AVAILABLE TO CLECs FOR ROUTING TRAFFIC.

A. BellSouth provisions, maintains, and repairs interconnection trunks for CLECs in a manner that is equal in quality to the way in which BellSouth provisions trunks for its own services. 47 C.F.R. § 51.305(a)(3); *see also* Knology Agmnt., Att. 3, § 3.3. BellSouth designs its interconnection facilities to meet the same technical criteria and service standards that are used within its own network. *See* Knology Agmnt., Att. 3, §§ 3.2 – 3.4;. BellSouth offers CLECs various options to route local/intraLATA toll traffic and transit traffic over separate trunk groups or over a single trunk group. *See* NewSouth Agmnt., Att. 3; Knology Agmnt., Att. 3.

First, BellSouth provisions local/intraLATA toll trunks for traffic between CLEC end users and BellSouth end users or Wireless Service Providers and vice versa. Local traffic or local/intraLATA toll traffic may be delivered at the BellSouth local tandem, the BellSouth access tandem, or the BellSouth end office. Local/intraLATA toll trunks may use multi-frequency ("MF") or Signaling System 7 ("SS7") signaling and may use one-way or two-way trunking. *See* NewSouth, Att. 3, §2.6.

In addition, BellSouth provides transit trunks for traffic between a CLEC and a third party such as an Independent Company, Interexchange Carrier, or another CLEC (i.e., where a BellSouth end user is not involved). Transit trunk groups are generally two-way trunks, but may be built as one-way trunks. They may use MF or SS7 signaling. Transit

intraLATA toll traffic from the CLEC must be delivered to the BellSouth access tandem. Transit local traffic may be delivered to the BellSouth access tandem or to the BellSouth local tandem. *See* Knology Agmnt., Att. 3, §2.6.

If the CLEC chooses, additional trunk groups may be established for operator services, directory assistance, emergency services and intercept. *See* Knology Agmnt., Att. 3, § 2.6.2.2.1.

Q. ARE CLECs PURCHASING INTERCONNECTION TRUNKS?

A. Yes. As of February 28, 2002, BellSouth had provisioned 44,999 trunks interconnecting its network with the networks of CLECs in Tennessee (that is, trunks from CLECs' switches to BellSouth's switches). In its nine-state region, BellSouth had installed 466,877 trunks from CLECs' switches to BellSouth's switches as of that same date. As of February 28, 2002, BellSouth had provided 266,534 two-way trunks (including transit trunks) to a total of 100 CLECs across BellSouth's nine-state region. In Tennessee, BellSouth has provided 22,772 two-way trunks (including transit trunks) to 30 CLECs who also have ordered and been provided trunk groups to BellSouth's local tandem switches.

Q. HOW DO CLECs REQUEST INTERCONNECTION TRUNKS?

A. CLECs request interconnection trunks by submitting an Access Service Request ("ASR") to BellSouth's Interconnection Purchasing Center ("IPC"). BellSouth established the IPC during the second quarter of 1998 to facilitate BellSouth's handling of ASRs submitted

by the CLECs and payment of CLECs' reciprocal compensation charges. The IPC receives ASRs from the CLECs, captures information required for Carrier Access Billing System ("CABS") billing purposes, screens the ASR for accuracy, and routes the ASR via the Telcordia (formerly Bell Communications Research, Inc. or "Bellcore") Exchange Access Control and Tracking ("EXACT") System to BellSouth's Circuit Capacity Management ("CCM") Center. The BellSouth CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to BellSouth's Circuit Provisioning Group ("CPG"). The CPG is responsible for issuing required trunk and facilities orders to BellSouth's Network Infrastructure Support Center ("NISC"), which prepares required switch translations, and BellSouth's Local Interconnection Switching Center ("LISC"), which coordinates the testing and turn-up of the trunks. The LISC forwards the orders to BellSouth's Work Management Center ("WMC") and BellSouth's Field Work Groups ("FWGs") for testing and turn-up of the trunks.

From February 2000 through February 2002, BellSouth's IPC processed 37,908 orders from CLECs for interconnection trunks in Tennessee and processed 525,941 orders from CLECs across BellSouth's nine-state region.

Q. HOW DOES BELLSOUTH PROCESS ITS OWN TRUNK AUGMENTATIONS TO BELLSOUTH'S POINT OF INTERCONNECTION WITH CLECs?

A. For trunks originating on BellSouth's network and terminating on the CLEC's network, the process for establishing and augmenting trunks is the same as the CLEC process to

establish interconnection trunks with BellSouth, except for the billing. The CCM issues an "external" ASR to the CLEC and an "internal" ASR to the IPC. The IPC screens the "internal" ASR for accuracy, and routes the ASR via the EXACT System to the CCM Center. The CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to the CPG. The CPG is responsible for issuing required trunk and facilities orders to the NISC, which prepares required switch translations, and BellSouth's LISC, which coordinates the testing and turn-up of the trunks. The LISC forwards the orders to BellSouth's WMC and BellSouth's FWGs for testing and turn-up of the trunks.

Q. PLEASE DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING THE NUMBER OF TRUNKS REQUIRED TO PROVIDE INTERCONNECTION SERVICES.

A. All trunk forecasting and servicing for CLEC local and intraLATA toll trunk groups is based upon the same industry standard objectives that BellSouth uses for its own trunk groups. BellSouth uses the standard objective of two (2) percent overall call blocking during the time-consistent average busy hour in the busy season which consists of one (1) percent blocking from the end office to the local tandem and one (1) percent blocking from the local tandem to the end office. When an access tandem serves as the intermediary switch, the standard objective is one and one-half (1.5) percent overall blocking during the time-consistent average busy hour in the busy season. This consists of one-half (0.5) percent blocking on the common transport trunk group from the end office to the access tandem and one (1) percent blocking from the access tandem to the end office.

BellSouth's forecasting process is designed to determine the amount of traffic that will be handled by each central office, and the number of trunks that will be required to carry that traffic during the forecast period (normally five years). BellSouth's General Trunk Forecast (the "GTF") is maintained daily and includes forecasts both for BellSouth traffic and for CLEC traffic.

Twice a year, the BellSouth LISC initiates written requests for forecasts from all CLECs who have a presence in any of the nine BellSouth states. The forecasting periods cover January - June and July - December. The LISC provides the CLECs' forecasts to the BellSouth CCM Centers in the nine states. The CLECs' forecasts are necessary in order to incorporate the CLECs' requirements into BellSouth's GTF.

To prepare the GTF, BellSouth begins with the number of trunks currently in service. BellSouth then calculates a growth factor (that is, the percentage of growth expected over the next forecast period as well as anticipated growth in traffic that may be generated by new services.) This data is measured using "busy hour" information, and is measured and gathered using a BellSouth system, the Network Information Warehouse, which conforms to national industry standards. BellSouth also adjusts for planned network rearrangements, such as switch replacements, relocations, or additions. The growth factor is then applied to the trunks currently in service.

As CLECs interconnect to BellSouth's network, the transitioning of traffic from BellSouth to the CLECs often requires more trunks than would normally carry the traffic in question when BellSouth was the sole provider of service. The purpose of the CLEC forecast is to identify locations and estimated quantities to be used in developing factors

to account for these transitional effects in the network. After BellSouth's growth factor is applied to the trunks in service, BellSouth applies these transitional factors. After these adjustments for growth and transitional factors are taken into account, BellSouth's forecast is reflected in the GTF.

Q. PLEASE DISCUSS THE FORECASTING RESPONSIBILITIES OF BELLSOUTH AND THE CLECs.

A. BellSouth and the CLECs are jointly responsible for forecasting, monitoring, and servicing all two-way trunk groups between the two networks. *See* NewSouth Agmnt., Att. 3, § 3.6. BellSouth is responsible for forecasting, monitoring, and servicing the one-way trunk groups terminating to CLECs. CLECs are responsible for forecasting, monitoring and servicing the one-way trunk groups to BellSouth, including terminating, transit, operator services, directory assistance, and E911 trunks. Standard trunk traffic engineering methods are used as described in Telcordia document SR-TAP-000191, Trunk Traffic Engineering Concepts and Applications, or as otherwise mutually agreed to by the parties.

BellSouth will use its best efforts in conjunction with the CLEC to create the most effective and reliable interconnected telecommunications network. BellSouth and the CLEC will meet periodically for the purpose of exchanging non-binding forecasts of their traffic and volume requirements for interconnection. *See* NewSouth Agmnt., Att. 3, § 3.6. Forecast meetings may be face-to-face, or by video or audio conference. *See* SGAT, §XVII.B; XVII.C.

In addition to, and not in lieu of, the required non-binding forecasts, BellSouth and the CLEC may negotiate a binding forecast that commits the forecast provider to purchase, and the forecast recipient to provide, a specified volume of interconnection trunks to be utilized as set forth in the binding forecast. The terms of such a binding forecast will be negotiated and may contain provisions regarding price, quantity, and liability for failure to perform as described in the Authority's Final Order of Arbitration in Docket No. 99-00377 between BellSouth and ICG. *See* SGAT, §XVII.D.

Q. PLEASE DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING SWITCH CAPACITY NEEDS.

A. BellSouth forecasts its switch capacity needs based on two inputs – the GTF and the access line forecast. As described above, the GTF is created using CLEC inputs. Thus, CLEC plans are taken into account both in BellSouth's trunk forecasting and in its switch planning and forecasting processes. For most switches, the capacity managers generally schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 97 percent utilization.

Some specific switches have been identified as candidates for trunk relief when the installed trunk capacity reaches 90 percent utilization. Candidate offices are those offices that meet the following criteria:

- End office digital switches
- Switches with 100 trunking DS1s currently installed (a DS1 contains 24 voice channels)
- Switches with growth of at least 75 trunking DS1s per year

Those offices that are candidates for relief at 90 percent are larger offices typically serving business customers, and are likely to also have high usage between CLEC's switches and BellSouth's switches.

For tandem switches, the capacity managers schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 85 percent utilization.

An addition of trunk terminations is scheduled to complete when the switch has reached its targeted trunk utilization percentage. In other words, BellSouth does not wait until that utilization percentage has been reached before triggering the addition. Once the capacity manager has determined the anticipated target exhaust date for a switch, the capacity manager subtracts an appropriate amount of time from that exhaust date to allow for the equipment addition to be engineered, manufactured, shipped, and installed in the switch. Thus, BellSouth initiates the addition of trunk terminations well in advance of the targeted exhaust date. As discussed earlier, CLECs inform BellSouth of their anticipated traffic growth through the routine exchange of traffic forecasts.

Q. DOES BELLSOUTH MAKE INTERCONNECTION TRUNKS AVAILABLE ON A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth's performance data for interconnection trunks will be discussed in the performance data testimony of Alphonso Varner.

FIBER-MEET

Q. DESCRIBE THE FIBER-MEET ARRANGEMENT.

A. "Fiber-Meet" is an interconnection arrangement whereby the parties physically interconnect their networks via an optical fiber interface (as opposed to an electrical interface) at which one party's facilities, provisioning, and maintenance responsibility begins and the other party's responsibility ends (i.e., at a Point of Interface). If a CLEC elects to interconnect with BellSouth pursuant to a fiber-meet arrangement, the CLEC and BellSouth shall jointly engineer and operate such. See NewSouth Agmnt., Att. 3, § 1.11.

COLLOCATION

Q. DOES BELLSOUTH MAKE SPACE AVAILABLE IN ITS PHYSICAL STRUCTURES TO FACILITATE THE INTERCONNECTION OF ITS NETWORK FACILITIES WITH THOSE OF CLECs?

A. Yes. Collocation is a process pursuant to which BellSouth permits CLECs to contract for space in BellSouth's premises, as that term is defined by the FCC, so that CLECs may interconnect their network facilities with BellSouth's network facilities. BellSouth offers a variety of collocation arrangements as described below. Where technically feasible, BellSouth will make physical collocation available in any BellSouth premises where space is available for collocation.

Q. DESCRIBE BELLSOUTH'S PHYSICAL COLLOCATION OFFERINGS.

A. BellSouth will provide to a CLEC at the CLEC's request, on a first-come, first-served basis, physical collocation under the same terms and conditions available to similarly situated carriers and on terms and conditions that are just, reasonable and non-discriminatory. 47 C.F.R. § 52.323 (f); SGAT, § II.A.7. Where sufficient space exists, CLECs can physically collocate in BellSouth's premises to terminate a CLEC's cables on its own equipment. Physical Collocation is available at Central Offices, Serving Wire Centers and at Remote Sites and may be offered in the following types: Caged, Shared Caged, Cageless, or Adjacent. *See* NewSouth Agmnt., Att. 4.

With physical collocation, equipment ownership, operation, maintenance and insurance are the responsibility of the collocator or its approved agent. BellSouth permits the collocation of any type of equipment that is directly related to and thus necessary, required, or indispensable for interconnection to BellSouth's network or for access to unbundled network elements in the provision of telecommunications services. *See* NewSouth Agmnt., Att. 4, § 1.3. In addition, BellSouth permits the physical collocation of microwave facilities when technically feasible for interconnection to BellSouth's network or for access to UNEs used in the provision of telecommunications services. *See* SGAT, Attach. I. With physical collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the fiber optic cables carrying the CLEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323 (d)(1); NewSouth Agmnt., Att. 4, § 1.3. BellSouth will provide at least two interconnection points at premises where there are at least two such interconnection points available and where capacity exists. For purposes of collocation, the

interconnection point is the point at which the CLEC enters BellSouth's premises, namely the manhole or the cable vault.

Physical Collocation is a negotiated contract arrangement in all BellSouth states for the placement of collocator-owned facilities and equipment in BellSouth's premises. The terms and conditions pursuant to which BellSouth offers physical collocation are set forth in detail in the testimony of Wayne Gray; *see* also, NewSouth Agmnt., Att. 4.

Q. IS BELLSOUTH PROVIDING PHYSICAL COLLOCATION IN TENNESSEE?

A. Yes. In Tennessee, as of February 28, 2002, BellSouth had completed 476 physical collocation arrangements, with two (2) in progress, for over 30 different CLECs, of which 291 are cageless physical collocation arrangements. Physical collocation arrangements were established in 59 different central offices out of a total of 196 BellSouth central offices in Tennessee as of February 28, 2002. As of February 28, 2002, there were 4,121 physical collocation arrangements in place for CLECs throughout BellSouth's nine-state region. Of these, 2,581 were cageless physical collocation arrangements. Throughout BellSouth's region, an additional 23 physical collocation arrangements were in progress for 11 different CLECs as of February 28, 2002. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Tennessee and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE PROVISIONING INTERVALS FOR PHYSICAL COLLOCATION?

A. Yes. Pursuant to the Intermedia Arbitration Order, BellSouth will provision physical cageless collocation space in Tennessee, in accordance with the requesting carrier's application, within thirty (30) calendar days after BellSouth's receipt of the CLEC's firm order when there is conditioned space and the CLEC installs the bays/racks (ordinary conditions). When other conditions apply (extraordinary conditions), BellSouth's provisioning interval for cageless collocation will not exceed ninety (90) calendar days from the date of the firm order. BellSouth will provision caged physical collocation arrangements requested by the CLEC, provided that physical collocation space is available in BellSouth facilities, within ninety (90) calendar days from the date of the firm order.

Q. DESCRIBE BELLSOUTH'S VIRTUAL COLLOCATION OFFERING.

A. Upon request of the CLEC, or when space is not available for physical collocation, BellSouth offers virtual collocation in accordance with the existing BellSouth FCC Tariff Number 1, Section 20, "Virtual Expanded Interconnection Service", as contemplated by Paragraph 826 of the *Local Competition Order*, 11 FCC Rcd at 15912. BellSouth will also negotiate terms and conditions for virtual collocation upon request by a CLEC. Virtual collocation provides for the placement of collocator-owned transmission equipment and other facilities in BellSouth's central offices for interconnection to BellSouth's network. Such equipment must be necessary for the provision of telecommunications services and may include, but not be limited to, optical terminating equipment and multiplexers, digital subscriber line access multiplexers ("DSLAMs"), routers, asynchronous transfer mode ("ATM") multiplexers, and remote switching modules. Virtual collocation arrangements may interconnect to designated BellSouth

tariffed services, local interconnection trunks and/or unbundled network elements. BellSouth will provide virtual collocation in a manner that permits CLECs to combine UNEs. With virtual collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the fiber optic cables carrying the CLEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323(d)(1). BellSouth will perform all maintenance and repair on equipment in virtual collocation arrangements once the collocator requests such work. BellSouth will install, maintain and repair collocated equipment in the same manner as BellSouth provides for its own equipment. The terms and conditions pursuant to which BellSouth provides virtual collocation are set forth in detail in the testimony of Wayne Gray.

Q. IS BELLSOUTH PROVIDING VIRTUAL COLLOCATION IN TENNESSEE?

A. Yes. In Tennessee, as of February 28, 2002, there was one (1) virtual collocation arrangement in progress and there were 11 virtual collocation arrangements in service located in 11 different BellSouth central offices. Those central offices are located in eight (8) cities in Tennessee. Across BellSouth's nine-state region, over 40 different CLECs requested and BellSouth provided 422 virtual collocation arrangements with construction of an additional 12 arrangements underway as of February 28, 2002. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Tennessee and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE INTERVALS FOR VIRTUAL COLLOCATION?

A. Yes. Neither the FCC nor the Authority has established provisioning intervals for virtual

collocation. Notwithstanding that fact, BellSouth will provide virtual collocation in fifty (50) calendar days from receipt of a Bona Fide Firm Order ("BFFO") under ordinary circumstances and seventy-five (75) calendar days from receipt of a BFFO under extraordinary circumstances.

OTHER INTERCONNECTION METHODS

Q. DOES BELLSOUTH OFFER MEANS OTHER THAN COLLOCATION FOR INTERCONNECTION?

A. Yes. BellSouth also offers assembly point arrangements. Assembly point arrangements allow a CLEC to combine UNEs without physical collocation or virtual collocation. *See* SGAT, § II.D.1. The assembly point is a cross connection device to which BellSouth will deliver UNEs requested by CLECs using the arrangement. In this arrangement, BellSouth will supply all of the equipment required by the CLEC to access UNEs.

BellSouth makes physical collocation available in compliance with its SGAT and applicable interconnection agreements. Moreover, BellSouth is providing interconnection at the local tandem. A CLEC may select either basic or enhanced local tandem interconnection. Basic local tandem interconnection allows CLECs to terminate traffic to BellSouth's end office switches and wireless service provider switches within the area served by the tandem. Enhanced local tandem interconnection adds the ability to terminate traffic to other CLEC switches and independent LEC switches in the area served by the tandem. *See* NewSouth Agmnt., Att. 3, §§ 1.5; 1.10; SGAT, § I.A.5. As of

February 28, 2002, BellSouth had provided 2,592 local tandem interconnection trunks to 22 CLECs in Tennessee.

CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 2.

A. BellSouth meets the requirements of Checklist Item 2 by offering access and interconnection that includes "[n]ondiscriminatory access to network elements in accordance with the requirements of Section 251(c)(3) and 252(d)(1)." 47 U.S.C. § 271(c). Section 251(c)(3) requires BellSouth to provide CLECs with nondiscriminatory access to UNEs at any technically feasible point on rates, terms and conditions that are just, reasonable, and nondiscriminatory. This section also requires BellSouth to provide UNEs in a manner that allows CLECs to combine such elements in order to provide a telecommunications service. As detailed below, BellSouth's interconnection agreements and its Tennessee SGAT satisfy these obligations. BellSouth's provision of access to Operations Support Systems ("OSS") functions will be addressed in Phase II of the OSS proceeding.

As required by 47 C.F.R. § 51.307, BellSouth provides to a requesting CLEC (for the provision of telecommunications service) nondiscriminatory access to network elements on an unbundled basis at any technically feasible point which is at least equal in quality to the access BellSouth provides to itself. *See* NewSouth Agmnt., GTC-A, § 4.0. These network elements provide the CLEC access to all features, functions and capabilities of

the network elements in a manner that allows the CLEC to provide any telecommunications service that the network element is capable of providing. *See* Interconnection Agreement Between BellSouth and Intermedia ("Intermedia Agmnt."), §VIII.E. Att. 2, § 1.1. Each network element BellSouth provides to CLECs is at a level of quality and performance that is at least equal to that which BellSouth provides to itself.

BellSouth provides ordering and provisioning of UNEs to CLECs that are equal in quality to the ordering and provisioning services BellSouth provides to itself or to any other CLEC. *See* NewSouth Agmnt., Att. 6, § 1.1. As required by the FCC, and as set forth in its interconnection agreements and its SGAT, BellSouth makes available nondiscriminatory access to the following unbundled elements at Total Element Long Run Incremental ("TELRIC") rates approved by the Authority:

Local loop, including sub-loops and the high frequency portion of the loop
Loop concentration in BellSouth central offices
Loop + Port Combinations
Loop + Transport Combinations
Network Interface Device ("NID")
Local switching capability
Tandem switching capability
Interoffice transmission facilities
Digital cross connection capability
Signaling networks and call-related databases
Operations support systems functions
Local channel

Channelization

Dark fiber

Loop conditioning

See Intermedia Agmnt., §VII; NewSouth Agmnt., Att. 2. BellSouth also provides access to the facilities or functionality of network elements separately from access to other network elements and for a separate charge. 47 C.F.R. § 51.307(d). BellSouth will utilize its best efforts to obtain coextensive third-party intellectual property rights for CLECs using UNEs.

Requesting CLECs are entitled to exclusive use of an unbundled network element, and to the use of its features, functions, or capabilities, for a set period of time. 47 C.F.R. § 51.309(c). BellSouth, however, retains ownership of the facility and remains obligated to maintain, repair or replace the network element as necessary.

A CLEC may provide telecommunications services wholly through BellSouth's UNEs, without using any facilities of its own. The terms and conditions pursuant to which BellSouth provides access to UNEs are offered equally to all requesting CLECs. 47 C.F.R. § 51.313(a). Moreover, as discussed more fully in the testimony of John Ruscilli, filed concurrently herewith, the "Most Favored Nation" clause in BellSouth's interconnection agreements and the provisions of 47 U.S.C. § 252(i) allow a CLEC to adopt terms, conditions and prices of another CLEC's contract in accordance with the FCC's rules. *See* NewSouth Agmnt., GTC-A, § 16.

With the exception of the Network Interface Device ("NID"), the minimum set of network elements are required separately by the checklist and therefore will be discussed

in later sections of my testimony. The NID, however, will be discussed in this section, as will UNE combinations.

Q. DESCRIBE THE NID OFFERING.

A. The NID is a cross-connect device used to connect BellSouth's loop facilities to a customer's inside wiring. The NID contains connection points to which the service provider and the end user customer each make their connections. *See* NewSouth Agmnt., Att. 2, § 4.0. When the CLEC provides its own facilities, the CLEC will provide its own NID and thereby will interface to the customer's inside wire through the customer chamber of the BellSouth NID. 47 C.F.R. § 51.319(2). This method of access has been referred to as the "NID-to-NID" method, in that the CLEC connects its NID to the BellSouth NID and thereby gains connectivity between the CLEC's loop and the customer's inside wire. As a second method, a CLEC may connect its loop directly to any available spare terminal in the BellSouth NID and thereby gain access to the customer's inside wire. 47 C.F.R. § 51.319(2); *see also* NewSouth Agmnt., Att. 2, § 4.0. Any upgrades or rearrangements to the NID required by the CLEC are performed by BellSouth based on time and materials charges. In situations in which no spare terminals are available in the BellSouth NID, the CLEC may remove BellSouth's loop from BellSouth's NID in order to terminate the CLEC's loop to BellSouth's NID. As of February 28, 2002, no CLEC had requested an unbundled NID in Tennessee or anywhere in BellSouth's nine-state region. Nonetheless, BellSouth stands ready to provided unbundled NIDs to CLECs upon request.

Where a CLEC obtains unbundled local loops from BellSouth, BellSouth also provides

the NID. BellSouth connects the drop wire, where present, between the loop distribution facilities and the NID at no additional charge to the CLEC. *See* NewSouth Agmnt., Att. 2, § 2.2.1.

At multiple dwelling units or multiple-unit business premises, BellSouth will provide, where technically feasible, a Single Point of Interconnection ("SPOI") that is suitable for use by multiple carriers. *See* SGAT, §II.

Q. HAS BELLSOUTH PROVIDED ACCESS TERMINALS TO CLECs IN TENNESSEE AND IN ITS NINE-STATE REGION FOR THE PURPOSE OF GAINING ACCESS TO SUB-LOOP ELEMENTS?

A. BellSouth has not provisioned any such access terminals to CLECs in Tennessee because none have been requested. BellSouth has, however, provisioned over 175 access terminals across its nine-state region. BellSouth stands ready to provide access terminals to CLECs in Tennessee upon request.

Q. MAY A CLEC TEST THE UNES IT IS OBTAINING FROM BELLSOUTH PRIOR TO TURNING UP A CUSTOMER'S SERVICE?

A. Yes. Each CLEC may perform testing of its UNEs using whatever methods it deems appropriate in light of its network configuration. BellSouth will provide UNEs to each CLEC's collocation arrangement at the specified level of quality. BellSouth has tested and confirmed its ability to provide UNEs to requesting CLECs.

Q. DESCRIBE BELLSOUTH'S CROSS-CONNECT OFFERING.

A. Cross connections are the facilities by which BellSouth extends its network to the point of access selected by a CLEC, as described above. The FCC's *Local Competition Order* required incumbent LECs to provide such facilities and stated that the LEC could recover the costs associated with providing cross connections. Cross connections are wires or optical fibers or other equipment that connect one piece of equipment to another on a semi-permanent basis. For instance, some cross connections are made using a simple pair of copper wires called a jumper. Different loop options require different types of cross connections. In fact, several cross connections may be required for many of the options. BellSouth offers the following types of loop cross connects:

- Cross connect to Digital Cross-connect System ("DCS")
- Cross connect to Multiplexer/Interoffice transport
- Cross connect to collocation arrangement
- Cross connect to switch port

In addition, BellSouth offers the choice of three types of cross connects with subloop elements. The applicable cross connects are as follows:

- Two wire
- Four wire
- Dark fiber

Cross connections must also be used with Unbundled Dedicated Transport ("UDT"). The dedicated transport cross connects are the equipment needed to connect the interoffice dedicated transport transmission facilities to the point of access. The following cross connects are available with UDT:

- Voice grade 2-Wire

- Voice grade 4-Wire
- Digital 56/64 Kilobits per second ("Kb/s")
- DS1
- DS3
- OC3
- OC12
- OC48 (Only between BellSouth offices)
- Dark fiber

Q. DESCRIBE BELLSOUTH'S DIGITAL CROSS CONNECT OFFERING.

A. A Digital Cross Connect System ("DCS") is an electronic device that provides the capability of rearranging circuits on high-speed facilities without the need to de-multiplex the signals. Without DCS, signals cannot be exchanged between high-speed circuits without returning all of the circuits to analog electrical signals. BellSouth offers DCS in conjunction with the unbundled dedicated transport element with the same functionality that is offered to interexchange carriers or with additional functionality as provided in a BellSouth/CLEC interconnection agreement. 47 C.F.R 51.319 (d)(2)(iv);

BellSouth provides CLECs three types of DSC port configurations as follows:

- DS0 channel port termination.
- DS1 channel port termination.
- DS3 channel port termination.

A CLEC may utilize BellSouth's Management Terminal Interface ("MTI") through the

use of a computer terminal on the CLEC's premises to access a database maintained by BellSouth to reconfigure the CLEC's Dedicated Transport facilities. A CLEC may use the MTI to directly access and control the CLEC's 45 Megabits per second ("Mbps") facilities or 1.544 Mbps facilities or 64 Kbps facilities or unbundled dedicated transport, subtending channels, and internodal facilities (i.e., the facilities that connect a DCS in one central office with a DCS in another central office).

CLECs remotely access the database by using a computer terminal on the CLEC's premises in conjunction with the CLEC's facilities or BellSouth Unbundled Loops or Dedicated Transport elements (Entrance Facility and/or Interoffice Transport), or in conjunction with a local telephone line with a seven-digit or ten-digit telephone number. CLECs may use DCS to perform the following functions:

- Routing/Rerouting - The routing feature allows a CLEC to select the routes that will be used to connect circuits between DCSs. The CLEC may control the route selection process by various parameters according to the CLEC's needs. A CLEC may also reroute circuits from a failed internodal facility to a working one.
- Renaming- A CLEC may rename its circuits and facilities.
- Scheduled Command Definition – A CLEC may specify circuit reconfiguration on special days, e.g., payday, holidays.
- Transaction Log – A CLEC is provided a database log that contains every transaction. These transactions include reconfiguration, scheduling, macro development, alarm surveillance, and attempted transactions.
- Scheduled Command Summary Screen – A CLEC may view the status of its reconfiguration reservations.
- Macro Command/Network Modeling – A CLEC may initiate, with one command,

multiple two-point cross connections. The CLEC can build separate network macros, such as daytime macros, nighttime macros, and disaster recovery macros and invoke their activation or switch from one to the other.

- Perform real-time configuration management and alarm surveillance.
- Electronically cross-connect and route traffic in order to:
    - Alleviate congestion
    - Isolate faults
    - Change routing logic
    - Monitor network performance
    - Pre-arrange and automatically switch to backup facilities for disaster recovery

BellSouth provides the cross connects necessary to extend Dedicated Transport facilities to points of access designated by the CLEC. 47 C.F.R. § 51.319(d)(2)(iii). In addition to the standard arrangements, the CLEC may request new or additional unbundled transport elements via the BFR process.

COMBINATIONS OF UNES

Q. GENERALLY DESCRIBE BELLSOUTH'S COMBINATION OFFERINGS.

A. BellSouth provides access to UNEs in a manner that allows requesting carriers to access combinations of network elements as well as to combine UNEs for themselves. *See* Intermedia Combination Agreement, 7/12/00, §1.1. BellSouth provides CLECs access to a variety of means by which CLECs may combine network elements, including caged, cageless, and shared collocation, *see* NewSouth Agmnt., Att. 4, and an Assembly Point

arrangement. *See* SGAT, § II.D.1. BellSouth also offers other technically feasible methods of combining UNEs via the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0. Each of these options is described more fully in my testimony on Checklist Item 1, and collocation is described more fully in the testimony of Wayne Gray.

Q. DOES BELLSOUTH OFFER COMBINATIONS OF UNES TO CLECs?

A. Yes. Except upon request, BellSouth will not separate requested network elements where such elements are, in fact, combined in BellSouth's network to the location the CLEC wants to serve. *See* SGAT, § II.D (3). Moreover, in accordance with decisions of the Authority, BellSouth goes beyond what is required by the 1996 Act by making available UNE combinations so long as the relevant facilities are ordinarily combined, even if the particular elements are not in fact combined.

The rates for these UNE combinations are addressed in the testimony of John Ruscilli. Mr. Ruscilli also addresses the conditions pursuant to which BellSouth offers the Enhanced Extended Link ("EEL"). The ordering mechanism for combinations will be addressed in Phase II of the OSS docket.

Q. MAY CLECs COMBINE UNEs THEMSELVES?

A. Yes. BellSouth provides access to UNEs in a manner that allows requesting carriers to combine those elements. CLECs may use either physical collocation (including caged, shared cage, cageless, and adjacent, where space is not available), virtual collocation arrangements, or assembly point arrangements, *see* SGAT, § II.D.1, to combine UNEs.

In addition, CLECs may request other technically feasible methods of combining UNEs through the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0.

The UNE combination is effectuated as follows: BellSouth will wire each UNE to the tie cable and pair running between BellSouth's distributing frame and the CLEC's collocation arrangement as designated by the CLEC on its UNE order. For example, both the loop and the switch port are terminated on the Main Distribution Frame ("MDF") within the BellSouth central office. Upon request of the CLEC, BellSouth will wire the loop to the tie cable and pair facility designated by the CLEC on its unbundled loop order. Likewise, BellSouth will wire the unbundled switch port to the tie cable and pair designated by the CLEC on its unbundled switch port order. In the case of physical collocation, BellSouth's wiring of the UNEs to the tie cable and pair interconnection facilities designated by the CLEC correlates to the pre-designated positions on the interconnection point (that is, BellSouth's distributing frame) serving the collocation arrangement. The CLEC may complete the combination via connections within its collocation arrangement either manually or electronically, at the election of the CLEC. These connections within the CLEC's collocation arrangement may be pre-wired or established on an as-needed basis at the election of the CLEC. To facilitate UNE combinations using virtual collocation, the CLEC may employ any of several options that include, but are not limited to: pre-wired terminations on the CLEC's transmission equipment; use of the CLEC's electronic digital cross-connection facilities or other means of performing cross-connections remotely; or connections on a per request basis.

An example of using pre-wired terminations might include the CLEC's arranging the pre-wiring of connector block "position 100" to "position 200", "position 101" to "position

201" and so forth. Should the CLEC wish to combine two elements, such as the combining of an unbundled loop with an unbundled switch port, the CLEC would specify the BellSouth cable and pair assignment correlating to "position 100" on the unbundled loop order and would specify the BellSouth cable and pair assignment correlating to "position 200" on the unbundled switch port order. With "position 100" and "position 200" having been pre-connected, the UNEs would thus be combined once BellSouth completes its connection of each of the UNEs ordered to the designated interconnection facility cable and pair assignments.

Q. IT APPEARS THAT THE DISTRIBUTION FRAME IS AN ESSENTIAL COMPONENT OF A CLEC's ABILITY TO COMBINE UNES. CAN BELLSOUTH ACCOMMODATE THE CLECs' DEMAND FOR DISTRIBUTING FRAME CONNECTOR BLOCKS?

A. Yes. BellSouth can fully accommodate demand for new distributing frame connector blocks for CLECs. While space on distributing frames is a finite resource, this is not a consequence of local competition. Because of increasing retail demand, BellSouth has for many years been faced with the possible exhaustion of space on distributing frames within its central offices. This increasing demand is evidenced by the fact that in 1992, there were roughly 2.1 million access lines in Tennessee; through December 2001, there were over 2.6 million access lines in Tennessee, a more than 23 per cent increase in nine (9) years. BellSouth has always effectively met the challenges of increased demand -- a fact no party contests. For example, in the years 2000-2001, BellSouth completed seven (7) jobs that included 164 vertical additions to its conventional main distribution frames and COSMIC main distribution frames in Tennessee. Also, BellSouth has never denied

any CLEC's request for a UNE because of a lack of main distributing frame connector blocks. BellSouth likewise will continue to make needed additions to its distributing frames on a nondiscriminatory basis, as with other facilities such as switches and loop facilities, to accommodate CLECs' needs.

Q. HAS BELLSOUTH PROVIDED CLECs WITH UNE COMBINATIONS?

A. Yes. As of February 28, 2002, BellSouth had 53,370 loop and port combinations in place for CLECs in Tennessee and 727,624 such combinations in place for CLECs across BellSouth's nine-state region. In addition, BellSouth had 514 loop and transport combinations (EELs) in place for CLECs in Tennessee.

Q. DESCRIBE THE MEANS BY WHICH CLECs MAY COMBINE INDIVIDUAL UNEs OBTAINED FROM BELLSOUTH WITH THE CLEC's OWN FACILITIES.

A. A CLEC may also use its physical collocation arrangement to combine UNES that the CLEC acquires from BellSouth with the CLEC's own equipment or facilities. BellSouth will extend UNEs to a CLEC's physical collocation arrangement and will terminate those UNEs in such a way as to allow the CLEC to provide any cross connections or other required wiring within the collocation arrangement in order to effect the combination. In such an arrangement, the CLEC is responsible for making any necessary cross connections within the physical collocation arrangement, for example, by making cross connections at a frame or cross connection block within the physical collocation arrangement. As noted above, the CLEC may choose to "pre-wire" these connections in anticipation of BellSouth's providing the UNEs, thereby eliminating the need to establish

these connections during the customer cutover process.

For example, BellSouth will deliver both unbundled loops and unbundled dedicated transport facilities to the CLEC's collocation arrangement. The CLEC is then free to cross-connect the loop and transport facilities in any manner it chooses. Similarly, BellSouth will deliver unbundled loops and unbundled switch ports to any CLEC's collocation arrangement and, again, the CLEC may cross-connect the unbundled loop and unbundled switch port in any manner the CLEC desires.

In order to combine network elements in their collocation arrangements, CLECs will use the same types of cross-connections that BellSouth regularly uses thousands of times every day in its retail operations. When BellSouth connects a new customer to its network, it uses cross-connections to combine facilities, just as CLECs may do. In its retail operations, BellSouth regularly uses multiple cross-connections between loops and switch ports, as well as on Intermediate Distributing Frames ("IDFs"), and provides high quality transmission performance on the resulting service. CLECs' use of cross-connections to combine network elements into an operational network is a routine part of local telephone operations and is precisely analogous to the manner in which BellSouth establishes service to a customer premises not previously served by BellSouth's own network.

CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 3.

A. Section 271(c)(2)(B)(iii) of the Act requires BellSouth to provide nondiscriminatory access to poles, ducts and conduits and rights-of-way to CLECs when requested. The FCC found that BellSouth had met all requirements for Checklist Item 3 in the *Second Louisiana Order*. BellSouth's procedures and processes described in that application are the same as those that are used in Tennessee. In Section III of the SGAT, and in various negotiated and arbitrated agreements, see NewSouth Agmnt., Att. 8, BellSouth continues to offer nondiscriminatory access to poles, ducts, conduits, and rights-of-way in a timely fashion as discussed in Exhibit WKM-2**.**

Q. ARE CLECS USING BELLSOUTH'S POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. Yes. As of March 6, 2002, CLECs in Tennessee had executed with BellSouth 55 license agreements and 109 license agreements region-wide, (both state-specific agreements and multi-state agreements) that allow those CLECs to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 670 requests in Tennessee for access to poles, ducts, conduits, and rights-of-way from 17 CLECs with no requests being denied.

CHECKLIST ITEM 4: LOCAL LOOP

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 4.

A. Checklist Item 4 requires that BellSouth provide local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. 47

U.S.C. § 271(c)(2)(B)(iv). BellSouth provides nondiscriminatory access to local loop transmission on an unbundled basis and has procedures in place for the ordering, provisioning, and maintenance of unbundled loops.

Q. DESCRIBE THE UNBUNDLED LOOPS BELLSOUTH MAKES AVAILABLE TO CLECs.

A. The local loop network element is defined as a dedicated transmission facility between a distributing frame (or its equivalent) in a BellSouth central office and the loop demarcation point at an end user customer's premises. The local loop network element includes all features, functions and capabilities of the transmission facility, including dark fiber and attached electronics (except those electronics used for the provision of advanced services, such as Digital Subscriber Line Access Multiplexers or "DSLAMs"), and loop conditioning. 47 C.F.R. § 51.319(a). BellSouth allows CLECs to access unbundled loops at any technically feasible point. BellSouth provides CLECs access to unbundled local loops in a manner that allows an efficient competitor a meaningful opportunity to compete.

BellSouth makes the following loop types available to CLECs and had provided the following quantities in Tennessee as of February 28, 2002:

- SL1 voice grade loops (221)
- SL2 voice grade loops (44,667)
- 2-wire ISDN digital grade loops (1,212)
- 2-wire ADSL loops (1,601)
- 2-wire HDSL loops (53)

- 4-wire HDSL loops (5)
- 4-wire DS-1 digital grade loops (3,130)
- 56 or 64 Kbps digital grade loops (0)
- UCL (Long and Short) loops (527)
- DS3 Loops (0)
- UCL-ND (43)
- UDC (931)

CLECs may request additional loop types through the BFR process. BellSouth provides access to loops at any technically feasible point with access to all features, functions, and capabilities unbundled from other UNEs; without any restrictions that impair use by CLECs; for a CLEC's exclusive use; and in a manner that enables CLECs to combine loops with other UNEs. *See* NewSouth Agmnt., Att. 2. Moreover, BellSouth offers local loop transmission of the same quality, same equipment, and same technical specifications used by BellSouth to service its own retail customers.

Q. ARE CLECs PURCHASING UNBUNDLED LOOPS FROM BELLSOUTH?

A. Yes. As of February 28, 2002, BellSouth had provisioned over 52,000 unbundled loops to CLECs in Tennessee. In BellSouth's nine-state region, BellSouth had provisioned over 420,000 unbundled loops as of that same date.

Q. DOES BELLSOUTH OFFER UNBUNDLED LOOPS SERVED BY INTEGRATED DIGITAL LOOP CARRIER ("IDLC") TECHNOLOGY?

A. Yes. IDLC is a special version of DLC that does not require the host terminal in the

central office (sometimes referred to as the Central Office Terminal or "COT"), but instead terminates the digital transmission facilities directly into the central office switch. In the Texas Section 271 decision, the FCC found that "the BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology or similar remote concentration devices for the particular loops sought by the competitor." *SWBT*, ¶ 248. BellSouth provides access to such IDLC loops via the following methods:

Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to a virtual Remote Terminal (RT) set-up for universal service (that is, a terminal that can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area ("CSA"). For two-wire ISDN loops, the universal digital loop carrier facilities may be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on DCS equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC.

Alternative 5: When IDLC terminates at a peripheral capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC. If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.

Alternative 6: BellSouth will install and activate new Universal DLC ("UDLC") facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.

Alternative 7: When it is expected that growth will not create the need for

additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

These alternative arrangements will be used where available to permit the CLEC to order a loop and to provide the CLEC with the capability to serve end users at the same level BellSouth provides its retail customers, to the extent technically feasible. *See e.g.* Intermedia Agmnt., Att. 2, § 3.0; SGAT, Attach. C, § 2.9.1.

Because certain circuits cannot be supported via an IDLC system in those instances where NGDLC is installed, BellSouth normally reserves some NGDLC capacity to support those special service circuits (both its own and those of CLECs) through a universal DLC arrangement based on site-specific forecasts. BellSouth does not reserve loops served by NGDLC for its own purposes, and does not restrict CLEC access to BellSouth loops. *See* NewSouth Agmnt., Att. 2, § 2.2.1.

Q. DESCRIBE BELLSOUTH'S UNIVERSAL DIGITAL CARRIER LOOP OFFERING.

A. BellSouth provides CLECs the Universal Digital Carrier ("UDC") capable loop. This loop gives CLECs the ability to arrange the individual channels of an ISDN line such that it appears to the end user to be a single channel of 144 Kbps. Some CLECs have referred to such an arrangement as ISDN Digital Subscriber Line ("IDSL") service.

Q. DOES BELLSOUTH OFFER LOOP CONDITIONING?

A. Yes. BellSouth offers loop conditioning in accordance with applicable FCC rules and

orders. Loop conditioning is defined as the removal from the loop of any devices that may diminish the capacity of the loop to deliver high-speed switched wireline telecommunications capability, including xDSL service. BellSouth provides loop conditioning for unbundled loops, whether or not BellSouth offers advanced services to the end-user on that loop. *See* SGAT, § IV.F. BellSouth's loop conditioning offer is described fully in the testimony of Wiley (Jerry) G. Latham.

Q. ARE CLECs PURCHASING LOOP CONDITIONING?

A. Yes. As of February 28, 2002, one (1) CLEC in Tennessee had made one (1) request for loop conditioning. Across BellSouth's region, as of that same date, there were a total of 136 requests.

Q. DOES BELLSOUTH OFFER SUB-LOOP ELEMENTS IN COMPLIANCE WITH CHECKLIST ITEM 4?

A. Yes. In addition to the unbundled loops themselves, BellSouth offers CLECs nondiscriminatory access to sub-loop elements. See NewSouth Agmnt., Att. 2, § 6.0. A sub-loop unbundled network element is an existing portion of the loop that can be accessed at accessible points on the loop. An accessible point on the loop is where technicians can access the copper wire or fiber within the cable without removing a splice case to reach the wire or fiber within. This includes any technically feasible point near the customer premises (such as the pole or pedestal, the NID, or minimum point of entry ("MPOE") to the customer's premises), the feeder distribution interface ("FDI"), the Main Distributing Frame, remote terminals and various other terminals. BellSouth offers

loop concentration/multiplexing as a sub-loop element. BellSouth also provides unbundled access to the sub-loop elements loop feeder, loop distribution, intrabuilding network cable, and network terminating wire. Details about how these sub-loop elements are provided may be found at BellSouth's Interconnection website:

http://www.interconnection.bellsouth.com/products/unes.html

Q. ARE CLECs PURCHASING SUB-LOOP ELEMENTS?

A. Yes. While CLECs in Tennessee have not purchased any unbundled sub-loop elements referred to as loop distribution, BellSouth has provided 568 unbundled sub-loop loop distribution elements across its nine-state region as of February 28, 2002. BellSouth stands ready to provide undundled sub-loop elements to CLECs in Tennessee upon request.

Q. DOES BELLSOUTH PROVIDE ACCESS TO DARK FIBER?

A. Yes. BellSouth also provides access to unused transmission media, which in some cases is referred to as "dark fiber". BellSouth provides dark fiber in the subscriber loop segment of the network and in the dedicated interoffice transport segment of the network as a UNE when the CLEC has collocation space in a central office housing a BellSouth tandem or end office switch. BellSouth uses standardized forms to allow a CLEC to determine dark fiber availability via a service inquiry process and to order dark fiber via a local service request. BellSouth will use its best efforts to confirm the availability of dark fiber within ten (10) business days of receipt of a service inquiry. BellSouth will use its best efforts to provide dark fiber to the CLEC within thirty (30) business days from the

receipt of a complete, accurate and error-free local service request. BellSouth will either grant the request, and issue an appropriate lease, or deny the request. BellSouth shall make available dark fiber where it exists in BellSouth's network and where, as a result of future building or deployment, it becomes available. BellSouth may reserve a reasonable amount of dark fiber for future planned use. *See* SGAT, Attach. C, § 13.2. BellSouth has, where appropriate, executed non-disclosure agreements and agreed to share documents with CLECs in order to demonstrate BellSouth's specific documented plans. To exercise its right of revocation, BellSouth must demonstrate that the subject dark fiber is needed to meet BellSouth's bandwidth requirements or the bandwidth requirements of another local service provider. BellSouth's dark fiber interoffice service terminates on a standard Light Guide Cross-connect ("LGX") termination at both ends. The dark fiber subscriber loop service terminates on a standard LGX in the subscriber's Serving Wire Center. A collocation cross-connect is used to provide connectivity between the dark fiber and the CLEC's collocation space arrangement.

Q. ARE CLECs PURCHASING DARK FIBER?

A. Yes. BellSouth has no dark fiber arrangements in place in Tennessee because none have been requested. However, BellSouth has provided a total of 22 dark fiber arrangements in two (2) other states within BellSouth's nine-state region. BellSouth stands ready to provide dark fiber arrangements to CLECs in Tennessee upon request.

Q. DOES BELLSOUTH OFFER CLECs LINE SHARING?

A. Yes. BellSouth provides CLECs with access to the high frequency portion of the local

loop as a UNE in compliance with the FCC's *Line Sharing Order*. The high frequency portion of the loop is defined as the frequency range above the voice band on a copper loop facility carrying analog circuit-switched voice band transmissions where the incumbent LEC is the voice provider. *See* SGAT, §IV. BellSouth will provide requesting carriers access to the high-frequency portion of the loop at the remote terminal location as well as at the central office. Line Sharing is discussed in more detail in the testimony of Tommy G. Williams.

Q. ARE CLECs PURCHASING LINE SHARING?

A. Yes. As of February 28, 2002, BellSouth had provisioned 6,521 line sharing arrangements across BellSouth's nine-state region and 727 line sharing arrangements in Tennessee.

Q. DOES BELLSOUTH PROVIDE ACCESS TO LOOP MAKEUP INFORMATION?

A. Yes. BellSouth provides CLECs access to information regarding a given loop's characteristics, including loop length, wire gauge, loop medium (copper or fiber), and information regarding any bridged tap, load coils, or repeaters present on the loop. Manual access to LMU information is described in the testimony of Wiley (Jerry) G. Latham. *See also,* SGAT, §IV. BellSouth's electronic pre-ordering and ordering interfaces have been enhanced to provide electronic access to LMU information and electronic ordering of ADSL-capable loops, HDSL-capable loops, and UCLs. Electronic access to LMU information is described in the testimony of Ron Pate.

Q. ARE CLECs ACCESSING LOOP MAKEUP INFORMATION?

A. Yes. From January 2001 through January 2002, CLECs made 54,646 mechanized LMU inquiries region-wide. In Tennessee, CLECs made 3,864 mechanized LMU inquiries. From November 2000 through January 2002, CLECs made 2,280 manual LMU inquiries region-wide, including 80 in Tennessee.

Q. DOES BELLSOUTH PROVIDE XDSL LOOPS TO CLECs?

A. Yes. As discussed earlier, BellSouth provides CLECs with various types of xDSL loops including the 2-wire Asymmetrical Digital Subscriber Line ("ADSL"), the 2-wire and 4-wire High-bit-rate Digital Subscriber Line ("HDSL"), 2-wire ISDN and Unbundled Copper Loops. *See* NewSouth Agmnt., Att. 2, § 2.0. Finally, BellSouth offers nondiscriminatory access to LMU information so that CLECs can determine whether or not existing loop facilities can support the desired xDSL service. BellSouth's xDSL loops, line conditioning and loop qualification offerings are discussed in detail in the testimony of Wiley (Jerry) G. Latham.

Q. ARE CLECs ORDERING XDSL LOOPS?

A. Yes. As of February 28, 2002, in Tennessee, BellSouth had provisioned 1,601 two-wire ADSL loops and 53 two-wire HDSL loops to over 10 different CLECs in Tennessee. As of the same date, BellSouth had provisioned within its region 16,750 two-wire ADSL loops, 443 two-wire HDSL loops, and 65 four-wire HDSL loops to over 30 different CLECs.

Q. DOES BELLSOUTH FACILITATE LINE SPLITTING?

A. Yes. BellSouth announced the availability of line splitting on BellSouth's Internet website (http://www.interconnection.bellsouth.com/products/index.html) via Carrier Notification SN91082407, issued May 23, 2001, effective June 19, 2001. BellSouth will work cooperatively with CLECs to develop rates, methods and procedures to operationalize a process whereby two CLECs, one being a provider of voice services and the other being a provider of data services, may provide service over the same loop. *See* SGAT, § II.B.9. Line Splitting is discussed in detail in the testimony of Tommy Williams.

Q. ARE CLECs ORDERING LINE SPLITTING?

A. No, not at this time. As stated above, however, BellSouth will facilitate line splitting for any CLEC that requests it.

HOT CUTS

Q. GENERALLY DESCRIBE THE PROCESS KNOWN AS A "HOT CUT."

A. Hot cuts involve the conversion of an existing BellSouth customer to the network of a competitor by transferring the customer's in-service loop over to the CLEC's network. BellSouth has established hot cut procedures that ensure accurate, reliable, and timely cutovers.

Q. DESCRIBE THE LOOP CUTOVER PROCEDURES ESTABLISHED BY BELLSOUTH TO ENSURE ACCURATE AND TIMELY CUTOVERS.

A. BellSouth has implemented three hot cut processes, two involving coordination at the time of the hot cut between BellSouth and the requesting CLEC and one process that does not involve such coordination. The two processes for coordinated loop cutovers are a time-specific cutover, and a non-time-specific cutover. With a time-specific cutover, a CLEC can set a specific date and time for a loop conversion by ordering and paying for time-specific order coordination. Under this option, BellSouth commits to use best efforts to complete the conversion as specified by the CLEC at the ordered date and time. *See* NewSouth Agmnt., Att. 2, § 2.2.2. If unforeseen circumstances occur during the provisioning process which may cause the date or time of the conversion to be in jeopardy, BellSouth notifies the CLEC as soon as the jeopardy is identified to allow the CLEC to respond to its customer as appropriate.

Under the second option, the CLEC may request non-time-specific coordination from BellSouth. Under this option, BellSouth and a CLEC mutually establish a date for the conversion but do not pick a specific conversion time at the time BellSouth receives the CLEC's local service request. Then, 24 to 48 hours in advance of the date of the conversion, BellSouth and the CLEC mutually set a time for the conversion. Like time-specific coordination, if unforeseen circumstances occur that may jeopardize BellSouth's ability to perform the conversion, BellSouth notifies the CLEC as soon as the jeopardy is identified.

As a third option, the CLEC may prefer no coordination of any kind between BellSouth

and the CLEC at the time of the hot cut. The CLEC merely specifies the date upon which it wishes BellSouth to perform its cutover activities and BellSouth notifies the CLEC once the hot cut is complete.

Q. DESCRIBE IN MORE DETAIL THE PROCESS FOR COORDINATED CUTOVERS.

A. Coordinated loop cutovers involve a number of steps. Exhibit WKM-3 shows, pictorially and with a brief narrative, the various work steps involved in a typical coordinated loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are as follows:

- The BellSouth central office technician receives a call from the Customer Wholesale Interconnection Network Services ("CWINS") Center to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-3.
- The technician types the cable pair number into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-3.
- The technician retrieves a copy of the work order for the unbundled loop. This is shown on page 3 of Exhibit WKM-3.
- The technician in the BellSouth central office responds to the BellSouth CWINS Center's request to initiate coordination of the overall cutover of service from BellSouth to the CLEC. This is shown on page 4 of Exhibit WKM-3.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a

special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-3.

- Next, the technician locates the existing jumper on the BellSouth Main Distributing Frame ("MDF") running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-3.
- The technician locates and removes the end of the jumper connected to the BellSouth cable pair. This is shown on page 8 of Exhibit WKM-3.
- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-3.
- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the CLEC's collocation arrangement. This is shown on page 10 of Exhibit WKM-3.
- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the CLEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-3.
- The technician connects the second end of the new jumper to the connector block and thus the tie cable to the CLEC's collocation equipment. This is shown on page 12 of Exhibit WKM-3.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the CLEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-3.
- Upon successful completion of the loop cutover, the technician verifies with the CLEC that the order was correctly worked, closes the work order, and notifies the CWINS Center. This is shown on page 14 of Exhibit WKM-3.
- Once the cutover is complete, the CLEC sends appropriate messages to effect

number porting.

Q. DOES BELLSOUTH DO ANY TESTING IN ADVANCE OF THE CUTOVER DATE?

A. Yes, BellSouth does advance testing for all designed circuits that come with test points. For such circuits, BellSouth will check the circuit 24 to 48 hours prior to the cutover date. For non-designed circuits, BellSouth performs continuity tests within the central office from the collocation arrangement to the BellSouth switch. For both designed and non-designed circuits, BellSouth tests on the cutover due date for CLEC dialtone. BellSouth also monitors the line for use. If during the test, BellSouth does not receive CLEC dialtone, the cutover will not take place unless the CLEC corrects the problem within 15 minutes or pays for standby time. Otherwise, the CLEC must elect to reschedule the conversion.

Q. DOES BELLSOUTH PERFORM LOOP CUTOVERS SIMULTANEOUSLY WITH NUMBER PORTING?

A. No. BellSouth does not perform loop cutovers simultaneously with number porting for the very important reason that to do so leaves the end user customer at risk of the number porting being completed early and calls bound for the end user customer being misdirected to the CLEC's switch. The loop cutover process is much more complicated in terms of the work steps involved (on the part of both BellSouth and the CLEC) than the number porting process. BellSouth performs all "up front" work in anticipation of the loop cutover being successfully completed.

The cutover process can be even more unobtrusive to the end user customer if one of several processes is followed. The CLEC might, for example, schedule the cutover late at night or on a weekend or at any other time when the end user customer will not be using the service. Other procedures such as pre-wiring cross connections in anticipation of BellSouth's providing the unbundled network elements likewise minimize or eliminate any inconvenience to the end user customer.

Q. DOES BELLSOUTH DOCUMENT ITS CUTOVER PROCESS SUCH THAT THE CLECs CAN REVIEW IT?

A. Yes. BellSouth has developed a detailed flow chart depicting the entire process. This process flow is attached to this testimony as Exhibit WKM-4.

Q. DOES BELLSOUTH HAVE METHODS AND PROCEDURES THAT DOCUMENT THIS PROCESS FLOW?

A. Yes. BellSouth has developed methods and procedures ("M&Ps") for its process flow. BellSouth's M&Ps are attached to this testimony as Exhibit WKM-5 and address the following:

- BellSouth's processes when a CLEC orders a coordinated conversion, whether the CLEC wants to set the conversion time for an offered day or whether the CLEC elects to have the time mutually agreed to prior to conversion.
- BellSouth's requirements to contact the CLEC at any point in the provisioning process where a jeopardy condition might result in a conversion delay.
- BellSouth's commitment to contact the CLEC 24 to 48 hours in advance of the

cut depending on the interval for the service ordered, to negotiate a non-time-specific conversion and/or to verify the CLEC's readiness to convert the customer's service as ordered.

- BellSouth's pre-testing responsibilities prior to conversion as well as on the conversion date to ensure the conversion is completed successfully.
- BellSouth's willingness to notify and cooperatively work with CLECs to correct any wiring defects which BellSouth identifies while performing pre-testing activities whether the fault appears to be in BellSouth's or in the CLEC's equipment.
- A CLEC's ability to accept or reject the completion of a conversion prior to BellSouth's completing the service request and BellSouth's obligation to provide timely notification to the CLEC for the porting of telephone numbers.

In addition, BellSouth has developed training materials with which to instruct its technicians about the loop cutover process. These are Work Instruction UTDIC001, Issue 2f and Work Instruction UTNIC001, Issue 2g. and are attached to this testimony as Exhibit WKM-6.

Q. IS BELLSOUTH'S CIRCUIT FACILITY ASSIGNMENT DATABASE AVAILABLE TO CLECs IN CONNECTION WITH LOOP CUTOVERS?

A. Yes. BellSouth makes available its Connecting Facility Assignment ("CFA") database to CLECs via the Internet. BellSouth provides CLECs with the circuit facility assignments (that is, cable and pair assignments for the cable between the CLEC's collocation arrangement and BellSouth's equipment such as distributing frames or cross-connect

bays) assigned to the CLEC at the time the CLEC's collocation arrangement is made available. Each CLEC is required to maintain its own connecting facility assignment records and to assign each pair that the CLEC wants BellSouth to use in order to connect BellSouth facilities to the CLEC's facilities.

CHECKLIST ITEM 5: LOCAL TRANSPORT

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 5.

A. Checklist Item 5 requires BellSouth to offer access to the local transport network element on the trunk side of a wireline local exchange carrier switch unbundled from switching or other services. 47 U.S.C. § 271(c)(2)(B)(v). Local transport consists of BellSouth interoffice transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provide telecommunications between wire centers owned by BellSouth or a CLEC or third parties acting on behalf of a CLEC, or between switches owned by BellSouth or a CLEC or third parties acting on behalf of a CLEC. BellSouth provides both types of local transport, namely dedicated and common (also called "shared.") *See* NewSouth Agmnt., Att. 2, § 8.0. BellSouth complies with the obligations of this checklist item, both through its interconnection agreements and through its SGAT.

Dedicated transport consists of BellSouth transmission facilities dedicated to a particular customer or carrier that provides telecommunications between wire centers owned by BellSouth or CLECs, or between switches owned by BellSouth or CLECs.

Common transport is interoffice transmission facilities, shared between BellSouth and one or more CLECs, that connect end office switches, end office switches and tandem switches, or tandem switches, in BellSouth's network. This definition of common transport assumes the interconnection point between the two carriers' networks is at BellSouth's switch.

With respect to dedicated transport, BellSouth does the following: (1) provides unbundled access to dedicated transmission facilities between BellSouth's central offices or between such central offices and serving wire centers ("SWCs"); between SWCs and interexchange carriers points of presence ("POPs"); between tandem switches and SWCs, end offices, or tandems of BellSouth and the wire centers of BellSouth and requesting carriers; (2) provides all technically feasible transmission capabilities such as DS1, DS3, and Optical Carrier ("OCn") levels that the competing carrier could use to provide telecommunications, including the necessary electronics; (3) does not limit the facilities to which dedicated interoffice transport facilities are connected, provided such interconnections are technically feasible, or restrict the use of unbundled transport facilities; and (d) to the extent technically feasible, provides requesting carriers with access to digital cross-connect functionality in the same manner that BellSouth offers such capabilities to interexchange carriers that purchase transport services.

In addition, CLECs may use dedicated transport to provide any transmission-specific service to the extent technically feasible.

With respect to common transport, BellSouth does the following: (1) provides common transport in a way that enables the traffic of requesting carriers to be carried on the same

transport facilities that BellSouth uses for its own traffic; (2) provides common transport transmission facilities between end office switches, between BellSouth's end office switches and tandem switches; and between tandem switches in BellSouth's network; (3) permits requesting carriers that purchase unbundled common transport and unbundled switching to use the same routing table that is resident in BellSouth's switch; and (4) permits requesting carriers to use common (or dedicated) transport as an unbundled element to carry originating traffic from, and terminating traffic to, customers to whom the requesting carrier is also providing local exchange service.

In the *Second Louisiana Order*, the FCC found that BellSouth complies with the requirements of this checklist item by making available dedicated and common transport between end offices, between tandems, and between tandems and end offices.[3] BellSouth continues to make both dedicated and shared transport available to CLECs on a nondiscriminatory basis and has procedures in place for the ordering, provisioning, and maintenance of both dedicated and shared interoffice transport.

In addition to the types of local transport currently offered by BellSouth, a CLEC may request new or additional unbundled transport elements using the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0.

Q. ARE CLECs ORDERING LOCAL TRANSPORT?

[3] Despite its favorable conclusion on BellSouth's provision of local transport, the FCC declined to approve this checklist item on the grounds that BellSouth had failed to make a prima facie showing that it provides nondiscriminatory access to OSS for the ordering and provisioning of dedicated and shared transport facilities. These issues will be addressed in Phase II of the OSS docket.

A. Yes. As of February 28, 2002, BellSouth had provided 1,351 dedicated local transport trunks to CLECs in Tennessee. BellSouth has provided 11,972 dedicated local transport trunks to CLECs in its nine-state region as of that same date.

For common transport, specific counts of trunks providing service to CLECs cannot be determined. This is because, as the name (common transport) implies, all trunks in a given trunk group are available for carrying service for any carrier which uses that group, including BellSouth and in some cases multiple CLECs. However, BellSouth can state that as of February 28, 2002, there were 30 CLECs in Tennessee and 100 CLECs in BellSouth's nine-state region using common transport to some degree.

CHECKLIST ITEM 6: LOCAL SWITCHING

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 6.

A. The Act requires BellSouth to offer access to "[l]ocal switching unbundled from transport, local loop transmission, or other services." 47 U.S.C. § 271(c)(2)(B)(vi). Local switching is the network element that provides the functionality required to connect the appropriate originating lines or trunks wired to the main distributing frame ("MDF") or to the digital cross connect panel to a desired terminating line or trunk. Local switching encompasses line-side and trunk-side facilities, plus the features, functions and capabilities of the switch. *See* NewSouth Agmnt., Att. 2, § 7.0.

BellSouth has procedures in place for the ordering, provisioning, and maintenance of unbundled switching on a nondiscriminatory basis. *See* ICG Agmnt., Att. 2 § 7.0; The

line-side facilities include the connection between a loop termination at, for example, a main distributing frame, and a switch line card. 47 C.F.R. § 51.319(c)(1)(i)(A). The trunk-side facilities include the connection between, for example, trunk termination at a trunk-side cross connect panel and a trunk card. 47 C.F.R. § 51.319 (c)(1)(i)(B). The functionality of BellSouth's local circuit switching offerings includes all of the features, functions and capabilities provided for the particular port type, including features inherent to the switch and the switch software. Local circuit switching also provides access to additional capabilities such as common and dedicated transport, out of band signaling, 911, operator services, directory services, repair service, as well as Advanced Intelligent Network ("AIN") and similar capabilities.

Because BellSouth obligates itself to provide common transport, it, by definition, provides CLECs with shared trunk ports, and the routing tables that instruct the call to follow a specified path. *See Second Louisiana Order*, ¶ 228 ("BellSouth is obligated to provide shared trunk ports and the routing tables necessary to get to the shared trunk port as a consequence of its legal obligation to provide shared transport.")

In addition, if CLECs want unbundled switching in conjunction with dedicated transport, CLECs likewise have access to BellSouth's routing tables.

Q. DOES BELLSOUTH PROVIDE ACCESS TO VERTICAL SERVICES AND FEATURES?

A. Yes. BellSouth's unbundled local circuit switching offerings include access to the vertical services and features the switch is capable of providing. All vertical features

loaded in a circuit switch are available to CLECs, whether or not BellSouth offers such features to its retail customers. Features loaded but not activated and features not loaded in the circuit switch may be requested through the BFR process. *See Second Louisiana Order*, ¶ 220 ("we find that a BOC can require a requesting carrier to submit a request for such a vertical feature through a predetermined process that gives the BOC an opportunity to ensure that it is technically feasible and otherwise develop the necessary procedures for ordering those features.")

Q. DOES BELLSOUTH ACTIVATE CLEC NXX CODES IN BELLSOUTH'S SWITCHES?

A. Yes. For successful call completion, each switch must recognize all active NXX codes in order to determine where the call is to be routed. When a CLEC, or any other LEC, obtains a new NXX code, BellSouth activates the code in its switches in accordance with the FCC's *Third Order on Reconsideration*, 12 FCC Rcd 12,460, ¶ 82. BellSouth performs this function at no charge to the CLEC.

BellSouth provides an NXX activation Single Point of Contact ("SPOC") to address CLEC inquiries about NXX codes. Among other functions, the NXX SPOC coordinates the activation of CLEC NXX codes within BellSouth's network and provides a trouble-reporting center for CLEC NXX code activation.

Since its establishment, the NXX SPOC has successfully facilitated the NXX code activation process. The NXX SPOC provides CLECs with a positive report on the activation of all of the CLECs' NXX codes that are activated in BellSouth's network. If

requested by a CLEC, a written response is provided to the CLEC when BellSouth's Complex Translations Group has provisioned the NXX code in the appropriate BellSouth switches and BellSouth has completed mechanized Automatic Message Accounting ("AMA") testing and validation. Since it began operation, the NXX SPOC has tracked the provisioning and testing of approximately 4,500 NXX codes for facility-based CLECs and LECs and has been involved in the resolution of over 400 customer related routing troubles.

Q. DOES BELLSOUTH PROVIDE FEATURE GROUP D SIGNALING IN CONJUNCTION WITH THE PROVISIONING OF UNBUNDLED LOCAL SWITCHING?

A. Yes. BellSouth will provide a CLEC with its choice of signaling format, including Feature Group D signaling, to the extent technically feasible.

Q. DOES BELLSOUTH PROVIDE ACCESS TO PACKET SWITCHING?

A. Pursuant to Rule 51.319, BellSouth will provide CLECs packet switching as a UNE in situations in which each of the following conditions is satisfied:

(1) BellSouth has deployed digital loop carrier systems, including but not limited to, integrated digital loop carrier or universal digital loop carrier systems; or has deployed any other system in which fiber optic facilities replace copper facilities in the distribution section (*e.g.*, end office to remote terminal, pedestal or environmentally controlled vault);

(2) There are no spare copper loops capable of supporting xDSL services the

CLEC seeks to offer;

(3) BellSouth has not permitted a CLEC to deploy a Digital Subscriber Line Access Multiplexer in the remote terminal, pedestal or environmentally controlled vault or other interconnection point, nor has the requesting carrier obtained a virtual collocation arrangement at these subloop interconnection points as defined in 47 C.F.R. § 319(b); and

(4) BellSouth has deployed packet switching for its own use.

See SGAT, § VI.D.

Q. DOES BELLSOUTH PROVIDE ACCESS TO TANDEM SWITCHING?

A. Yes. BellSouth's unbundled tandem switching element meets all the requirements of the FCC's Rules. Tandem switching is defined as trunk-to-trunk connection facilities, including but not limited to the connection between trunk terminations at a cross connect panel and a switch trunk card; the basic switching function of connecting trunks to trunks; and all technically feasible functions that are centralized in tandem switches (as distinguished from separate end office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features. 47 C.F.R. § 51.319(c)(2). Tandem switching provides trunk-to-trunk connections for local calls between two end office switches, including two end office switches belonging to different CLECs. To the extent that all signaling is SS7, tandem switching preserves Custom Local Area Switched Services ("CLASS") features and Caller ID information as calls are processed. BellSouth performs testing through the tandem switching element for CLECs in the same manner and frequency that it performs such testing for itself. To the extent that BellSouth manages traffic congestion for tandem switching for itself, it

also manages it for CLECs using unbundled tandem switching, including congestion points such as those caused by radio station call-ins, and network routing abnormalities, using capabilities such as Automatic Call Gapping, Automatic Code Gapping, Automatic Congestion Control, and Network Routing Overflow.

Q. ARE CLECs ORDERING UNBUNDLED LOCAL SWITCHING?

A. Yes. As of February 28, 2002, BellSouth had 13 unbundled switch ports in service in Tennessee. Region-wide, BellSouth had 258 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 53,370 switch ports in service in Tennessee and 727,624 in service regionally.

Q. DOES BELLSOUTH OFFER CUSTOMIZED ROUTING IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. Customized routing (which is also referred to as selective routing) permits requesting carriers to designate the particular outgoing trunks that will carry certain classes of traffic originating from competitors' customers. *See Second Louisiana Order*, ¶ 221. One specific use of customized routing is to allow calls from a CLEC's customers that are served by a BellSouth switch to reach the CLEC's choice of operator service or directory assistance service platforms which may be BellSouth's operator service and directory assistance service platforms or the CLEC's platforms or the platforms of a third party provider. Customized routing can be provided when a CLEC acquires unbundled local switching from BellSouth or resells BellSouth's local exchange services.

BellSouth offers two methods of customized routing to CLECs: AIN and LCCs. *See* SGAT, § X.A.3(f); NewSouth Agmnt., Att. 2, § 7.2.1.14.6.4. BellSouth has tested both methods and both currently are available.

Q. DESCRIBE THE AIN METHOD OF CUSTOMIZED ROUTING BELLSOUTH OFFERS.

A. BellSouth's AIN method uses a database of the CLEC's routing choices queried during call set up. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages. The AIN hubbing arrangement:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN-capable to use the AIN customized routing solution.
- Optimizes the use of trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN-capable. Also, the AIN hubbing arrangement allows the sharing of trunk groups that some CLECs have stated they prefer.

BellSouth completed an enhancement to its AIN method that further automates the means by which CLECs' routing information may be updated. End-to-End call-through testing was successfully completed on June 14, 2000. BellSouth then completed all methods and procedures for the service offering during the third quarter 2000, and posted a Market

Service Description ("MSD") to its interconnection website on October 23, 2000.

Q. ARE CLECs USING THE AIN METHOD OF CUSTOMIZED ROUTING?

A. To date, no CLEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request.

Q. DESCRIBE THE LCC METHOD OF CUSTOMIZED ROUTING.

A. Using the LCC method, which is the method by which BellSouth routes its own end users' calls, end user calls are routed via the use of a LCC in the switch. For example, a CLEC's end users served by a BellSouth switch are configured such that when the end user dials 0-, a Line Attributes Table points to another table, known as a Position Table for 0- calls. The Position Table, in turn, identifies a trunk group to the appropriate operator services platform. For calls requiring a number pre-translation such as 411 or 611, the Line Attributes Table points the call to the appropriate pre-translator table, and this table then points the call to the appropriate destination. A separate LCC is not needed for each end user for each function, but rather the same LCC can be used for multiple subscribers. The same LCC connects each end user to the same destination for the same type of call. *See* e.g., NewSouth Agmnt., Att. 2, §10.4.

Availability of customized routing capability using LCCs is offered on a first-come, first-served basis. This method permits the passage of intraLATA toll and interLATA operator services traffic to interexchange carriers over Feature Group D trunks at the CLEC's option. While there are finite limits on the number of line class codes in

particular central office switches, BellSouth has not denied any request for customized routing based on lack of LCC capacity. Moreover, the AIN method of customized routing eliminates any potential exhaust concerns about the LCC method of customized routing.

Q. ARE CLECs USING THE LCC METHOD OF CUSTOMIZED ROUTING?

A. Yes. BellSouth has provided the LCC method of customized routing to one CLEC in Georgia and at two (2) locations in Florida for use during the Florida Public Service Commission's third party testing of BellSouth's operations support systems ("OSS"). No CLEC in Tennessee has requested this method of customized routing; however, BellSouth stands ready to provide it.

Q. HOW IS THE AIN METHOD OF CUSTOMIZED ROUTING DIFFERENT THAN THE LCC METHOD?

A. The AIN method allows the use of shared trunk groups (for those CLECs using the AIN method) between the end office switch and the AIN hub switch to accomplish customized routing for customers served by different end offices subtending a particular AIN hub. In contrast, the LCC solution, as discussed above, requires a separate trunk group for each end office due to the inherent technical limitations of the switches. This separate trunk group may be shared, however, by those CLECs requesting the same branding or unbranding of their respective end users' OS/DA traffic. BellSouth uses separate trunk groups between its end office switches and BellSouth's operator services and directory assistance platforms for calls from BellSouth's end users.

Q. DO BELLSOUTH'S CUSTOMIZED ROUTING SOLUTIONS MEET THE FCC'S REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC discussed the CLECs' ability to route its customers' calls. Specifically, the FCC held that "BellSouth should not require the competitive LEC to provide the actual line class codes, which may differ from switch to switch, if BellSouth is capable of accepting a single code region-wide." *Second Louisiana Order*, ¶ 224. In compliance with this obligation, BellSouth will implement one routing pattern per region for a CLEC's customers. In addition, although it is not required to do so, BellSouth voluntarily will provide a single routing pattern on a statewide basis. This single routing pattern (whether region-wide or state-wide) can include routing to a BellSouth platform (branded or unbranded), to a CLEC platform, or to a third-party platform.

To avail itself of the single routing pattern, the CLEC need not put any LCC on its local service requests ("LSRs"). Such orders will be handled electronically (assuming, of course, that the orders would not otherwise fall out for manual handling) and therefore will need no manual intervention.

This line class code routing arrangement is identical to that provided to the BellSouth retail units. On its retail side, BellSouth has a single region-wide routing pattern for its customers' calls that is effectuated without the service representative having to populate the LCC on the service order. Likewise, BellSouth will provide a single routing pattern for CLECs that is effectuated without the CLEC service representative having to populate the LCC on the order.

The CLEC may request and BellSouth will provide multiple routing options in an end office. If a CLEC has requested multiple customized OS/DA Routing options in an end office, BellSouth will establish the appropriate LCCs for routing and the corresponding Selective Routing Codes ("SRCs") for mechanized ordering based on documentation supplied by the CLEC as described in BellSouth's CLEC Information Package, "Selective Call Routing Using Line Class Codes," which may be found on BellSouth's website: www.interconnection.bellsouth.com/guides/une/. The CLEC may order for an end user an OS/DA branding option other than the established default plan by providing an indicator identifying the specific routing to be used (Unbranded, Custom Branded, Self Branded) when it submits its LSR for that particular end user. The CLEC must include the predefined SRC as described above for the particular customized routing it has selected. In this scenario, the CLEC will provide information on the LSR designating the appropriate SRC to direct the call for those of the CLEC's end users for which the default routing plan will not be used.

CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION

Q. PLEASE DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 7.

A. BellSouth provides to CLECs access to 911/E911 services, directory assistance services, and operator call completion services at a level of quality and performance that is at least equal to that which BellSouth provides to itself. *See* Intermedia Agmnt., Att. 2, § 16.2.4.

911/E911

Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO 911 AND E911 SERVICES?

A. Yes. Section 271(c)(2)(B)(vii) of the Act requires a Bell Operating Company such as BellSouth to provide "[n]ondiscriminatory access to --- (I) 911 and E911 services. In the *Ameritech Michigan Order*, the FCC held that a BOC "must maintain the 911 database entries for competing LECs with the same accuracy and reliability that it maintains the database entries for its own customers" and that for facilities-based carriers, BellSouth must provide "unbundled access to [its] 911 database and 911 interconnection, including the provision of dedicated trunks from the requesting carrier's switching facilities to the 911 control office at parity with what [BellSouth] provides to itself." *Ameritech Michigan Order*, ¶ 256.

Q. DESCRIBE THE MEANS BY WHICH BELLSOUTH OFFERS CLECs ACCESS TO BELLSOUTH'S E911 DATABASE.

A. The BellSouth E911 database contains end user subscriber information that is useful to emergency service agencies in locating a customer dialing 911 for dispatching appropriate emergency services. The database contains information such as customer name, service address, class and type of service. BellSouth has had procedures in place since early 1996 by which CLECs can connect their switches to BellSouth's E911 tandems. Because methods and procedures have long been in place to allow other carriers, including independent LECs, access to BellSouth's E911 and 911 updating

capabilities, the necessary methods and procedures for obtaining such updating by CLECs have been business as usual for BellSouth. *See* NewSouth Agmnt., Att. 2, § 16.0, BellSouth's provision of nondiscriminatory access to the E911 database as well as procedures for updating and maintaining the E911 database both for CLEC and BellSouth end users are described in detail in Exhibit WKM-7.

In the *Second Louisiana Order*, the FCC found that BellSouth satisfied the requirements of Checklist Item (vii)(I). There has been no material change in BellSouth's provision of 911/E911 since that decision and thus the Authority should find BellSouth in compliance.

Q. ARE CLECs ACCESSING BELLSOUTH'S E911 DATABASE?

A. Yes. As of February 28, 2002, CLECs had requested and BellSouth had provided 452 such trunks for CLECs in Tennessee. In its nine-state region, BellSouth had 5,156 trunks in service connecting CLECs' switches with BellSouth's E911 arrangements as of that same date. In Tennessee, 25 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of February 28, 2002; and in BellSouth's nine-state region, 68 CLECs were doing so as of that same date. These mechanized updates include information about both end user customers to whom CLECs provide service via the resale provisions of the Act as well as those end user customers to whom CLECs provide service from the CLECs' own switches.

DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. WHAT ARE BELLSOUTH'S OBLIGATIONS WITH RESPECT TO DIRECTORY ASSISTANCE AND OPERATOR SERVICES?

A. Section 271(c)(2)(B)(vii)(II) and (III) of the Act requires BellSouth to provide nondiscriminatory access to "directory assistance services to allow the other carrier's customers to obtain telephone numbers" and "operator call completion services," respectively. Section 251(b)(3) obligates BellSouth to permit CLECs to have nondiscriminatory access to operator services, directory assistance and directory listing with no unreasonable dialing delays. BellSouth, however, is no longer obligated to provide operator and directory assistance services as a UNE because BellSouth provides customized routing as discussed earlier.

Q. DOES BELLSOUTH PROVIDE DIRECTORY ASSISTANCE SERVICE IN A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth provides directory assistance access service to CLECs in the same manner as it does for its own retail subscribers. *See* NewSouth Agmnt., Att. 2, § 10.3. Specifically, BellSouth provides CLECs with DAAS. DAAS allows CLECs' end users to obtain telephone number listing information from BellSouth. CLECs also have access to BellSouth's DACC service, which gives the CLEC's end user the option to have a call to BellSouth's DA service completed automatically. Facilities-based CLECs obtain access to these services through trunks connecting the CLEC's point of interface to BellSouth's DA platform.

Q. ARE CLECs USING DAAS AND DACC?

A. Yes. As of February 28, 2002, CLECs in Tennessee had 398 directory assistance trunks in place between those CLECs' switches and BellSouth's DA platform. In BellSouth's nine-state region, there were 3,085 such directory assistance trunks in place serving CLECs. In BellSouth's nine-state region, 38 CLECs were purchasing DAAS and 33 CLECs were purchasing DACC from BellSouth as of February 28, 2002. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's DAAS and DAAC services, the necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth.

Q. DOES BELLSOUTH PROVIDE CLECs WITH ACCESS TO BELLSOUTH'S SUBSCRIBER LISTING INFORMATION FOR CLECs TO ESTABLISH THEIR OWN DIRECTORY ASSISTANCE SERVICES?

A. Yes. BellSouth provides CLECs and other service providers with access to BellSouth's DADS, which allows CLECs to use BellSouth's subscriber listing information to set up their own directory assistance services. *See* NewSouth Agmnt., Att. 2 § 10.5. BellSouth also provides CLECs and other service providers with DADAS, which gives CLECs direct access to BellSouth's DA database so that CLECs may provide directory assistance services. *See* NewSouth Agmnt., Att. 2, § 10.6. BellSouth currently provides both DADS and DADAS to CLECs themselves and to various third-party service providers who, in turn, furnish the service to CLECs. Database information is available to CLECs in magnetic tape format, cartridge tape format, and where the CLEC has electronic

connectivity, in network data mover ("NDM") format.

All information contained in BellSouth's listing database for its own end users, CLECs' end users, and independent LECs' end users is available to competitive carriers in the same manner as it is available to BellSouth itself. BellSouth is fully compliant with Section 51.217(c)(3)(i) of the FCC's rules.

Q. ARE CLECs ACCESSING BELLSOUTH'S DIRECTORY DATABASES?

A. Yes. As of February 28, 2002, five (5) service providers were using BellSouth's Tennessee subscriber listings, via DADS, to provide DA service and third-party listing data to end users. Ten (10) service providers were using DADS across BellSouth's nine-state region as of that same date. As of February 28, 2002, two (2) service providers in the region were using DADAS to provide the service to CLECs.

Q. DESCRIBE BELLSOUTH'S INTERCEPT SERVICE OFFERING.

A. CLECs also have access to BellSouth's intercept service, which refers calls from a disconnected or non-working number to an appropriate announcement. Facilities-based CLECs obtain access to BellSouth's intercept service through a dedicated trunk facility. As of February 28, 2002, BellSouth had provided CLECs in Tennessee with 14 intercept trunks. In BellSouth's nine-state region, BellSouth had provided 176 intercept trunks to CLECs as of that same date. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's intercept service, the necessary methods and procedures for obtaining such access by CLECs are business

as usual for BellSouth.

Q. DESCRIBE BELLSOUTH'S OPERATOR CALL PROCESSING SERVICES OFFERING.

A. Operator call processing, which allows CLECs to obtain both live operator and mechanized functionality, is available from BellSouth. *See* NewSouth Agmnt., Att. 2, § 10. BellSouth call processing includes: Call Assistance and Call Completion services; Alternate Billing Services such as third number billing, calling card billing, and collect call handling; verification and interruption of a busy line; and operator transfer service. Facilities-based CLECs can obtain access to BellSouth's operator call processing by connecting their point of interface via a trunk group to BellSouth's operator services system.

Q. ARE CLECs ACCESSING BELLSOUTH'S OPERATOR SERVICES?

A. Yes. As of February 28, 2002, BellSouth had provided CLECs in Tennessee with 440 operator services trunks. Across its nine-state region, BellSouth had provided CLECs with 3,091 operator services trunks as of that same date. In Tennessee, BellSouth had provided CLECs with 47 verification trunks as of February 28, 2002. Across its nine-state region, BellSouth had provided CLECs with 464 verification trunks as of that same date. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's operator call processing, such access by CLECs is considered business as usual for BellSouth.

Q. CAN INFORMATION CONCERNING CLECs' END USER CUSTOMERS BE ENTERED INTO OR CORRECTED IN BELLSOUTH'S DIRECTORY ASSISTANCE AND OPERATOR SERVICES DATABASES?

A. Yes. BellSouth will update CLECs' end user listings equal to the service BellSouth provides to itself and its end users. *See* NewSouth Agmnt., Att. 2, §10.3.2.2. BellSouth's procedures for updating and maintaining the DA and OS databases for BellSouth's end user subscribers are described in detail in Exhibit WKM-8. As described in Exhibit WKM-8, procedures for both CLECs' subscribers and BellSouth's subscribers are performed in a similar and nondiscriminatory manner.

DISAGGREGATION OF PERFORMANCE DATA FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. DO BELLSOUTH'S PERFORMANCE MEASUREMENTS FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES SUFFICIENTLY DEMONSTRATE NONDISCRIMINATION?

A. Yes. In the *Second Louisiana Order*, the FCC stated that in future applications, BellSouth needed either to disaggregate its performance data for directory assistance and operator services between wholesale and retail, or explain why such disaggregation is unnecessary to show nondiscrimination. *Second Louisiana Order*, ¶ 245. Because BellSouth's provision of directory assistance and operator services to CLECs is parity by design, disaggregation of performance measurements for these services is unnecessary.

To demonstrate this fact, I directed the preparation of exhibits that describe the routing and handling of operator services and directory assistance calls. Exhibit WKM-9 describes the processing of such calls by Traffic Operating Position System ("TOPS") and its associated Queuing Management System ("QMS"). This exhibit was prepared by BellSouth subject matter experts responsible for staff support for BellSouth departmental operations in these two areas.

Q. EXPLAIN WHY DISAGGREGATION OF PERFORMANCE DATA IS UNNECESSARY.

A. Exhibit WKM-10 documents the flow of service orders from various sources (BellSouth's retail units, CLEC resale, CLEC UNE, and CLEC UNE and resale with customized call routing). As this Exhibit demonstrates, the flow of the service order is precisely the same regardless of the source of the service order. Universal Service Order Codes ("USOCs") on the service orders are used to establish switch translations that provide dial tone and various service features listed on each service request. The exact same list of USOCs, with the exception of four unique provisioning USOCs used for UNEs, is used on both BellSouth and CLEC orders to describe various features and functions. If the service order being processed is for a CLEC, it contains a special four-digit Field Identifier Code ("FID") that ultimately identifies the CLEC to the billing system. However, the FID is <u>not</u> input to the switch. Thus, the switch is "blind" as to whether a given end user customer is BellSouth's customer or a CLEC's customer. The service orders enter a system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM associates the USOCs assigned on service orders with an appropriate LCC that identifies the routing and screening characteristics of the line to the

switch. Nothing in the LCC distinguishes a BellSouth customer from a CLEC customer. The LCC information flows into a computer system named MARCH. MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control switches. Routing, screening, and trunking of calls by the switch are identical for lines associated with identical LCCs. Therefore, it is not necessary to perform measurements beyond this point in the process to demonstrate parity in the handling of operator services and directory assistance calls. The diagrams attached to Exhibit WKM-10 clearly show that the LCCAM to MARCH handoff merges traffic from all sources into a single flow determined solely by LCCs.

BRANDING

Q. WHAT BRANDING OPTIONS DOES BELLSOUTH PROVIDE TO CLECs?

A. BellSouth offers four service levels of branding to CLECs when CLECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branded; unbranded; custom branded; and self-branded. Unbranded, custom branded, and self-branded are all provided via customized call routing (also referred to as selective routing) that includes the LCC and AIN service offerings. BellSouth also offers OLNS that provides BellSouth branded, unbranded, and customized branded of Directory Assistance and/or Operator Call Processing. BellSouth's OLNS is deployed in Tennessee and throughout BellSouth's nine-state region. *See* NewSouth Agmnt., Att. 2, §10.4.

Q. HOW DOES BELLSOUTH ROUTE OPERATOR SERVICES AND DIRECTORY

ASSISTANCE TRAFFIC FOR ITS OWN END USER CUSTOMERS?

A. BellSouth routes its operator services or directory assistance traffic directly to a BellSouth TOPS platform rather than via a tandem switch. The operator services or directory assistance end office functions offered by BellSouth, as part of its retail services, require dedicated trunk groups from BellSouth end offices to the TOPS platform.

Q. PLEASE DESCRIBE THE OPERATION OF TOPS.

A. Exhibit WKM-9 provides a complete description of TOPS call flow via the QMS. Calls are initially queued based on call origination type. For example, a determination is made as to whether the call originated from a public telephone or arrived at TOPS via a directory assistance trunk group. Next, calls are ordered based on whether or not they have previously received some form of automated treatment or operator handling. Then the calls are processed through six refinement tables to enable them to be handled by operator groups best equipped to handle specific types of calls. For example, this process routes directory assistance calls to directory assistance equipped TOPS positions while calls requiring fluency in a particular language are routed to operators with skills in that language. Finally, the calls are routed to queues based on such factors as the age of the call, equipment availability, and force management considerations.

Q. HOW DOES TOPS TREAT CALLS FROM CLEC END USER CUSTOMERS?

A. CLECs' customers' calls to BellSouth's TOPS platform are handled in a

nondiscriminatory manner at parity with the treatment of calls from BellSouth's retail customers. TOPS does not distinguish between calls made by BellSouth end users and calls made by CLEC end users. Thus, the system represents parity by design. Nortel is the supplier of BellSouth's TOPS platform.

Q. DOES BELLSOUTH PERMIT A CLEC TO ROUTE ITS OPERATOR SERVICES OR DIRECTORY ASSISTANCE TRAFFIC TO ITS OWN OPERATOR SERVICES OR DIRECTORY ASSISTANCE PLATFORMS?

A. Yes. The CLEC may wish to route calls to its own operator or directory assistance platform for branding purposes. As discussed in Exhibit WKM-10, customized routing is ordered by use of an indicator that is then converted by LCCAM, as discussed above, into an LCC for use by the switch. Once this conversion occurs, the switch's processor routes the call based on the assigned LCC rather than on the basis of whether the LCC is a "BellSouth LCC" or a "CLEC LCC". If the LCC denotes that the call is to be routed to an operator services platform other than BellSouth's operator services platform, then the provisioning of the trunk group to the CLEC's choice of operator services platform is the responsibility of the CLEC. Under this scenario, the CLEC will have the option of treating the calls in any fashion it wants because the calls will be directed to the CLEC's (or third-party provider's) platform. The diagram for Example 3 of the attachments to Exhibit WKM-10 depicts the call processing flow of calls using customized routing.

Q. DOES BELLSOUTH PROVIDE CLECs WITH THE ABILITY TO APPLY UNIQUE BRANDING IN COMPLIANCE WITH THE FCC'S REBRANDING REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC stated that BellSouth must demonstrate that its method of providing branding results in nondiscriminatory access. *Second Louisiana Order*, at ¶ 247. BellSouth provides CLECs the ability to apply unique branding via the customized routing methods discussed in my testimony under Checklist Item 6 and the OLNS method described below.

Under the LCC method of customized routing, calls are directed at the end office switch to the requested OS/DA platform over dedicated trunks. Dedicated trunks are required because of the technical limitations of the switches. To the extent that CLECs choose the same OS/DA platform and the same branding (or unbranding) of calls, CLECs may share transport between the end office switch and the platform. A CLEC's use of line class codes to reach an OS/DA platform is the same as BellSouth's use of line class codes to reach its TOPS platform, and thus BellSouth's provision of customized routing is nondiscriminatory.

Under the AIN method of customized routing, calls are sent to an AIN hub that performs the database query. AIN uses centralized databases to determine routing instructions rather than have the same determination made at the end office switch level. In this arrangement, CLECs may share transport between BellSouth's end office switch to the AIN hub. Moreover, CLECs who opt for the same branding (or unbranding) of their traffic and whose traffic is sent to the same OS/DA platform can likewise share trunk groups between the AIN hub and that OS/DA platform.

Q. HAS BELLSOUTH PROVIDED DOCUMENTED METHODS AND PROCEDURES FOR CLEC PROVISIONING AND ORDERING OF CUSTOMIZED OS/DA

ROUTING?

A Yes. Bellsouth provided a CLEC Information Package, "Selective Call Routing Using Line Class Codes" on May 17, 2001, and subsequently updated to Version 3 on August 28, 2001, as attached in Exhibit WKM-11. In addition, BellSouth provided an information package, "BellSouth Advanced Intelligent Network Selective Carrier Routing (AIN SCR)", that describes procedures for ordering customized routing using AIN on April 30, 2001. Further, on July 27, 2001, the "BellSouth Operator Services ("OPS") Reseller/UNE-P CLEC Pre-Ordering and Ordering Guide for Operator Services-Custom Branding/Unbranding via OLNS Software" was published. These information packages can all be found on BellSouth's Interconnection website at: http://www.interconnection.bellsouth.com/guides/.

Q. DESCRIBE BELLSOUTH'S OFFERING OF ORIGINATING LINE NUMBER SCREENING.

A. OLNS is a method of providing customized branding in addition to the LCC and AIN methods described earlier in this testimony. OLNS provides a means of making information available to the OS/DA platform about the end user originating a telephone call. This information may be used to determine things such as an end user's local service provider and that local service provider's branding preferences. OLNS functionality makes originating line information available to BellSouth's OS/DA platform via centralized databases. In other words, OLNS allows end users' calls to proceed from the end office switches to BellSouth's OS/DA platform over common trunk groups (that is, a single trunk group between an end office switch and the OS/DA

platform carrying multiple service providers' traffic including calls from BellSouth's retail customers). Once the call arrives at the OS/DA platform, OLNS is used to "look up" the telephone number of the calling party in its database to determine whether and how to brand a call from that particular end user. OLNS customized routing provides CLECs with BellSouth branding, unbranded, and customized branding of Directory Assistance and/or Operator Call Processing.

BellSouth had informed CLECs of OLNS scheduled deployments in a carrier notification letter (SN91082120) on BellSouth's interconnection website dated December 22, 2000. OLNS was deployed in Tennessee on July 13, 2001. This carrier notification was updated on August 27, 2001, (SN91082573) to reflect OLNS availability in all nine (9) states in the BellSouth region. There are currently three (3) CLECs in Tennessee using OLNS for OS/DA customized branding. This feature is also being used by CLECs in each of the other eight (8) BellSouth states.

CHECKLIST ITEM 8: WHITE PAGES LISTINGS

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 8.

A. Checklist Item 8 requires that BellSouth's interconnection offerings include directory listings in BellSouth's white pages directory for customers served by a CLEC. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which CLECs may obtain such listings are

business as usual for BellSouth. The white pages listings will include the subscriber's name, address and telephone number. The FCC in the *Second Louisiana Order* found BellSouth in compliance with this checklist item. Nothing has changed since the FCC's finding and this Authority should likewise find BellSouth compliant with this checklist item.

Exhibit WKM-12 describes in detail the flow of orders received for the production of white pages directories and how this process is accomplished for both BellSouth's listings and CLECs' listings.

CHECKLIST ITEM 9: NUMBER ADMINISTRATION

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 9.

A. During February 1998, Lockheed-Martin assumed the NANPA functions previously provided by Bell Communications Research, Inc. ("Bellcore"), now Telcordia Technologies, Inc. This did not include the central office code assignment and NPA relief planning functions that continued to be performed by the dominant ILEC serving the particular geographic territory until a transition plan could be finalized to transfer these functions to Lockheed-Martin. The central office code assignment function was transferred to Lockheed-Martin region-by-region through an industry-accepted transition plan. In BellSouth's region, that transition began July 6, 1998, and concluded August 14, 1998. At this time, BellSouth no longer performs the central office code assignment function. NeuStar assumed all NANPA responsibilities on November 17, 1999, when the FCC approved the transfer of Lockheed-Martin's Communications Industry Service

Division to NeuStar.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR NPA RELIEF PLANNING NOW?

A. No. NeuStar also assumed responsibility for NPA relief planning. When BellSouth was responsible for NPA relief planning and as an NPA was found to be in jeopardy of exhausting before a NPA relief plan could be implemented, the BellSouth Central Office Code Administration Center implemented code conservation measures complying with consensus decisions of the local industry as reached in one or more Industry Jeopardy Meetings. NANPA now has the responsibility for jeopardy declaration in a NPA.

Q. PLEASE DESCRIBE BELLSOUTH'S ACTIONS PRIOR TO THE TIME NPA RELIEF PLANNING WAS TRANSFERRED TO NEUSTAR.

A. While serving as the Central Office Code Administrator for its territory, BellSouth maintained neutrality in performing the code administration functions and ensured that CLECs had nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth adhered to the code administration guidelines published by the Industry Numbering Council ("INC"), a national industry body under the Carrier Liaison Committee ("CLC"), sanctioned by the Alliance for Telecommunications Industry Solutions ("ATIS"). INC documents, including final documents, completed guidelines, and issue resolutions in final closure, are readily accessible via the Internet, at ATIS's website (http://www.atis.org). These guidelines provide instructions to all service providers, including CLECs, on how to request and have NPA/NXX codes assigned.

BellSouth established procedures to provide nondiscriminatory NXX code assignments to CLECs that conform to the INC standards. Pursuant to these procedures, as of August 19, 1998, BellSouth had assigned 2,141 NPA/NXX codes for CLECs in its nine-state region. Other than when faced with imminent NPA exhaustion, BellSouth did not refuse any CLEC requests for NPA/NXX code assignments, either in Tennessee or in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR THE ASSIGNMENT OF NPA/NXX CODES NOW?

A. No. Since NeuStar assumed the Central Office Code Administration function, BellSouth no longer has any responsibility for the administration or assignment of NXX codes to CLECs or any other telecommunications service provider. BellSouth follows the Central Office Code ("NXX") Assignment Guidelines developed by the INC in submitting NXX code requests to NANPA, entering code information into the appropriate national databases, activating NXX codes assigned to any service provider in BellSouth's territory, making available BellSouth NXX codes that are no longer in use, and all other areas covered by these and other appropriate industry guidelines. It is now NANPA's responsibility to supply competitively neutral number administration services and to ensure that all service providers have equal and non-discriminatory access to telephone numbers.

Q. WHAT RESPONSIBILITIES DOES BELLSOUTH NOW HAVE WITH REGARD TO THE ACTIVATION OF NXX CODES WITHIN ITS NETWORK?

A. BellSouth responded to CLEC concerns about accurate and timely activation of NXX codes by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to CLECs and independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If a CLEC or independent LEC intends to interconnect directly with BellSouth, or if interconnection arrangements with BellSouth are already in place, the CLEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its CO Code Request to the NANPA (NeuStar). If the CLEC gives BellSouth a copy of its Central Office Code Request, BellSouth is better able to coordinate activation of the Central Office Code in BellSouth's network.

Among other functions, the NXX SPOC coordinates the activation of CLEC NXX codes and provides a trouble-reporting center for CLEC code activation. Since its establishment in mid-1998, the NXX SPOC has operated successfully in keeping NXX activation problems to a minimum. The NXX SPOC provides CLECs with a positive report on the activation of all of the CLECs' NXX codes that are activated in BellSouth's network. If requested by the CLEC, a written response is provided to the CLEC when BellSouth's Complex Translations Group has provisioned the NXX code in the appropriate BellSouth switches and BellSouth has completed mechanized AMA testing and validation. Since it began operation, BellSouth's NXX SPOC has tracked the provisioning and testing of approximately 4,500 NXXs for facility-based CLECs and Independent Telephone Companies. BellSouth has never charged CLECs or LECs for NXX codes.

Q. WHAT INFORMATION DOES BELLSOUTH FURNISH TO NEUSTAR WITH RESPECT TO NUMBER RESOURCES?

A. BellSouth furnishes certain data to NeuStar with respect to number resources. For example, BellSouth provides the following: (1) Number Resource Utilization Forecast ("NRUF") Report – BellSouth prepares a NRUF Report and forwards it to NeuStar pursuant to FCC directives, and NeuStar uses the NRUF Reports from all carriers to estimate when all NPAs will exhaust; (2) Part 1 Central Office Code Request Form and Months-To-Exhaust Worksheet – when BellSouth requests a new central office code assignment for growth from NeuStar Central Office Code Administration, BellSouth submits a Part 1 Central Office Code Request Form and Months-To-Exhaust Worksheet that shows when the existing supply of telephone numbers in the central office will exhaust; and (3) Part 4 – New central office codes must be put to work within six months of being assigned or must be returned to NeuStar. BellSouth notifies NeuStar that an NXX code has been put to work by furnishing NeuStar with a Part 4.

CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 10.

A. This checklist item obligates BellSouth to provide:

- Nondiscriminatory access to databases and associated signaling necessary for call routing and completion. 47 U.S.C. § 271(c)(2)(B)(x).
- Nondiscriminatory access to signaling networks and call-related databases. 47

C.F.R. § 51.319(e).

The FCC, in its *Second Louisiana Order*, found that BellSouth was in compliance with this checklist item. Nothing has changed since the FCC's finding and this Authority should likewise find BellSouth compliant with this checklist item.

Q. GENERALLY DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS DATABASES AND SIGNALING NETWORKS.

A. BellSouth employs the same relevant systems, processes, and procedures in Tennessee as in Louisiana, which the FCC held were providing nondiscriminatory access to signaling and call-related databases. BellSouth provides nondiscriminatory access to its signaling networks, including Signal Transfer Points ("STPs"), Signaling Links, Service Control Points ("SCPs"), LIDB, Toll Free Number Database, AIN Toolkit, and the AIN method for Customized Routing. In addition, BellSouth also provides access to the LNP database and the CNAM database.

BellSouth provides nondiscriminatory access to its call-related databases and associated signaling as evidenced by the millions of queries that BellSouth's call-related databases have successfully handled for CLECs, IXCs, and other ILECs. BellSouth provides CLECs access to BellSouth's signaling network either directly, or through third party service providers, whichever the CLEC elects. BellSouth's provision of the AIN method for customized routing is described earlier in my testimony.

SIGNALING NETWORKS

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS SIGNALING LINKS AND SIGNAL TRANSFER POINTS.

A. BellSouth provides nondiscriminatory access to its signaling network, including Signaling Links and STPs on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i); *See* NewSouth Agmnt., Att. 2, § 11.0. Signaling networks enable a CLEC to send signals between its switches (including unbundled switching elements), between its switches and BellSouth's switches, and between its switches and those third-party networks with which BellSouth's signaling network is connected. BellSouth provides Signaling System 7 ("SS7") network service to CLECs for their use in furnishing SS7-based services to their own end users or to the end users of another CLEC that has subtended its STP to the signaling network of the interconnecting CLEC. *See* SGAT, § X. This arrangement permits CLECs to use BellSouth's SS7 signaling network for signaling between the CLECs' switches, between the CLECs' switches and BellSouth's switches, and between the CLECs' switches and the networks of other parties connected to BellSouth's SS7 network. Because all unbundled switching elements are provided on switches that BellSouth uses to provide service to its own customers, all signaling functions are identical. 47 C.F.R. § 51.319(e)(l)(iii); See NewSouth Agmnt., Att. 2, § 11.

The Signaling Link between the CLEC's switch and BellSouth's STP is an unbundled network element that CLECs can order by contacting their assigned account team representative at BellSouth. The BellSouth representative then arranges the set-up for the CLEC. When a CLEC purchases unbundled switching from BellSouth, BellSouth will

provide access to its signaling network in the same manner as BellSouth provides such access for itself.

BellSouth's SS7 network provides dedicated two-way signaling links that interconnect BellSouth's STP locations and the CLEC's Signaling Points at Signaling-Point-of-Interface ("SPOI") locations. SGAT, § X.A. The SS7 network consists of STP Port Termination(s) for CLEC signaling and STP Interconnection Facilities (also called Signaling Links). The port terminations consist of port connections operating at 56 Kilobits per second (56 Kbps) transmission facilities on BellSouth's STP. The STP Interconnection Facility is the transmission facility that lies between the multiplexing hub, which demultiplexes the CLEC's 56 Kbps transmission from DS1 transmission facilities, and the STP port. 47 C.F.R. § 51.319(e)(1)(ii); See NewSouth Agmnt., Att. 2, § 11.0.

STPs are signaling message switches that interconnect Signaling Links to route signaling messages between switches and databases. CLECs may use BellSouth's SS7 signaling network for signaling between their switches, between their switches and BellSouth's switches, and between their switches and the networks of other parties connected to the BellSouth SS7 network. STPs also provide access to other network elements connected to the BellSouth SS7 network including: (1) BellSouth-provided local end office switching or tandem switching; (2) BellSouth-provided SCPs or databases; (3) third-party provided local end office switching or tandem switching; and (4) third-party provided SCPs or databases. *See* NewSouth Agmnt., Att. 2, § 11.0*;*

Q. DOES BELLSOUTH PROVIDE SS7 NETWORK INTERCONNECTION?

A. Yes. SS7 Network Interconnection is the interconnection of the CLEC's local STPs and the CLEC's local end office switch or tandem switch with BellSouth's STPs. This interconnection provides connectivity that enables the exchange of SS7 messages among BellSouth's switching systems and databases, CLEC's local or tandem switching systems, and other third-party switching systems directly connected to the BellSouth SS7 network. SS7 network interconnection provides CLECs with connectivity to all components of the BellSouth SS7 network.

Q. IS ACCESS TO BELLSOUTH'S SIGNALING NETWORK AVAILABLE?

A. Yes. BellSouth's signaling network is available as evidenced by the fact that 15 CLECs had directly connected to BellSouth's signaling network in Tennessee as of February 28, 2002. Additional facilities-based CLECs may obtain access to BellSouth's signaling network as described above and in BellSouth's tariff (FCC No. 1). Because neither BellSouth's switch nor STP distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end users of resellers.

CALL-RELATED DATABASES

Q. DESCRIBE THE CALL-RELATED DATABASES BELLSOUTH OFFERS ON AN UNBUNDLED BASIS.

A. Section 51.319(e)(2)(ii) of the FCC Rules set forth certain call-related databases to which BellSouth must offer access on an unbundled basis. Consistent with that rule, BellSouth

provides access to its LIDB, Toll Free Number database, Local Number Portability database, CNAM database, Advanced Intelligent Network Services Feature database, as well as the 911 and E911 databases. *See* SGAT § X.A.3.d.

Q. DOES BELLSOUTH PROVIDE ACCESS TO ITS SERVICE CONTROL POINTS?

A. Yes. A Service Control Point ("SCP") is a specific type of network element where call related databases can reside. SCPs deployed in a SS7 network execute service application logic in response to SS7 queries sent to them by a switching system also connected to the SS7 network. SCPs also provide operational interfaces to allow for provisioning, administration and maintenance of subscriber data and service application data. CLECs may use either Feature Group D or SS7 signaling for interconnecting with BellSouth's network. *See* NewSouth Agmnt., Att. 2, §13.0.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS LIDB DATABASE.

A. The LIDB is a transaction-oriented database accessible through Common Channel Signaling ("CCS") networks such as BellSouth's SS7 network. It contains records associated with end user line numbers and Special Billing Numbers. BellSouth's region-wide LIDB processed more than 1.8 billion queries from CLECs and others during the period from January 1997 through January 2002. Access to the LIDB is through a third-party "signaling hub" provider or IXC directly connected to BellSouth's signaling network. LIDB queries are billed to the third-party "signaling hub" provider or IXC, not to the CLEC. CLECs can access the LIDB database once the CLEC puts required signaling links in place. *See* NewSouth Agmnt., Att. 2, § 13.4. Carriers may update

customer information contained in BellSouth's LIDB in substantially the same time and manner as BellSouth's retail operations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS CNAM SERVICE.

A. CNAM service enables the called end user to identify the calling party by a displayed name before the call is answered (often referred to as a "caller ID" service). BellSouth will provide all requesting CLECs nondiscriminatory access to its CNAM Service database. *See* NewSouth Agmnt., Att. 2, § 13.8. When a CLEC purchases unbundled local switching from BellSouth, access to the CNAM database will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

The calling party's name, date, and time of the call are retrieved from the SCP database and delivered to the end user's premises between the first and second ring for display on compatible customer premises equipment. CNAM Service Query is BellSouth's service that allows a CLEC to query BellSouth's Calling Name database.

When a CLEC operates its own switching center, access to the CNAM database is obtained through the SS7 network. The CLEC accesses the SCP through the BellSouth STP or by connecting the CLEC's STP to the BellSouth STP and then to the BellSouth SCP. CLECs that deploy their own switching facilities are able to access BellSouth's SS7 network for each of their switches through a signaling link between their switches and BellSouth's STP in the same manner as BellSouth connects its own switches to the STP. The same features, functions, and capabilities are available to the CLEC as are available to BellSouth. 47 C.F.R. §51.319(e)(2)(iv).

Q. IS CNAM AVAILABLE TO CLECs?

A. Yes. As of February 28, 2002, BellSouth had over 100 CNAM database customers, consisting of both CLECs and independent LECs, across BellSouth's nine-state region.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS TOLL FREE NUMBER AND NUMBER PORTABILITY DATABASE.

A. BellSouth's SGAT and agreements approved by this Authority provide the terms and conditions for nondiscriminatory access to BellSouth's Toll Free Number and Number Portability Database. *See* NewSouth Agmnt., Att. 2, § 13.5. Access to the Toll Free Number and Number Portability databases allows a CLEC to access BellSouth's Toll Free Number and Number Portability databases for the purpose of switch query and database response. The Toll Free Number database provides the CLEC information required to determine the appropriate routing to a toll free number such as an 800 or 888 number.

The Number Portability database comes in two forms. The Routing Service, which is a default query service, (if a company does not sign up for a query service, it will automatically use the Routing Service to complete unqueried calls to ported numbers) is available to any company and no registration is necessary. The Query Service is available to any company as well, but a three-page form must be completed and returned to BellSouth. The difference between the two services is that the Query Service is about one-fourth of the cost of the Routing Service. No contracts are necessary for either service. Additional information on both LNP database services is available at the

following locations:
http://www.interconnection.bellsouth.com/products/vertical/LNP__Query.html; and
http://www.interconnection.bellsouth.com/products/vertical/LNP__Call__Routing.html.

When a CLEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's Toll Free Number and Number Portability database. *See* NewSouth Agmnt., Att. 2, § 13.5.

BellSouth offers three different types of access to the BellSouth call related databases. The first type of access allows a CLEC whose switches are SS7 capable to attach those switches to BellSouth's STPs and then to the BellSouth call related databases. See SGAT, § X.A.

The second option is for a CLEC whose switches are SS7 capable to attach those switches to a third party's STPs. These STPs would be attached to BellSouth's STPs and then to BellSouth's call related databases. See SGAT, § X.A. A CLEC can use Feature Group D for calls using information retrieved from BellSouth's databases.

The third option allows access by a CLEC whose switches are not capable of supporting SS7 protocols. I am not aware of any requests from CLECs for such access, no doubt because the SS7 protocol has been used so extensively for many years that most, if not all, modern switching systems are SS7-capable. However, should a CLEC make such a request, BellSouth would respond using the BFR process.

All of the above features are available to a CLEC and its customers in the same manner

as provided by BellSouth to its own customers. When a CLEC operates its own switching system, access to the databases will be obtained by using the SS7 network. 47 C.F.R. § 51.319(e)(2)(iv).

When a CLEC purchases unbundled local switching from BellSouth, the access to the call related databases will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

Q. IS BELLSOUTH SUCCESSFULLY PROVIDING ACCESS TO ITS TOLL FREE NUMBER DATABASE?

A. Yes. BellSouth has offered independent LECs and other service providers access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through February 2002, CLECs and other service providers across BellSouth's nine-state region completed approximately 17 billion queries to BellSouth's Toll Free Number database. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO THE AUTOMATIC LOCATION IDENTIFICATION/DATA MANAGEMENT SYSTEM ("ALI/DMS").

A. The ALI/DMS database contains end user information (including name, address,

telephone information, and sometimes special information from the local service provider or end user) used to determine to which Public Safety Answering Point the call should be sent. BellSouth offers CLECs a data link to the ALI/DMS database or permits CLECs to provide their own data links to the database. *See* NewSouth Agmnt., Att. 2, § 13.6.

Q. DESCRIBE BELLSOUTH'S AIN NETWORK ARCHITECTURE.

A. AIN is a vendor-independent network architecture deployed by BellSouth that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages (called "triggers") from a switch through the STP to a SCP database. AIN uses distributed intelligence in databases to control call processing and to manage network information, rather than performing those functions at every switch. When a CLEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's AIN.

AIN access provides CLECs the ability to create service applications utilizing BellSouth's AIN and to deploy those applications via the BellSouth Service Management System ("SMS") in conjunction with BellSouth's SCPs. BellSouth provides access to its AIN SCP, or databases, through its AIN Toolkit and AIN SMS Access services. These services permit the CLEC to create and deploy AIN services on a BellSouth SCP using a set of service creation tools provided by BellSouth. BellSouth uses these same tools to create and deploy AIN services in exactly the same manner as is available to CLECs. As set forth in BellSouth's SGAT, SMS access allows CLECs to provide AIN services from either BellSouth switches or the CLEC's own switch. It also allows CLECs to create service applications using BellSouth's AIN service creation tools and to deploy those

services using BellSouth's service management tools. CLECs will have the same access to SMS as does BellSouth. *See* SGAT, § X.3.d.

Using BellSouth's AIN Toolkit, end user customers of the CLEC may also access BellSouth-created AIN applications and/or CLEC-created AIN applications residing in BellSouth's SCP either (1) via unbundled local switching purchased from BellSouth, or (2) via a CLEC's own switch that is connected to BellSouth's SS7 network via the SS7 network element. 47 C.F.R. § 51.319(e)(2)(iii), (iv) and § 51.319(e)(3)(C).

BellSouth has tested its AIN Toolkit, which provides a CLEC with the ability to create and offer AIN-service applications to the CLEC's end users, as well as its AIN SMS access, which provides a CLEC with access to the BellSouth-provided service creation environment. The completion of test calls and the generation of billing records were part of the testing process that completed March 31,1997. The testing confirmed that service orders flowed through BellSouth's systems properly and that accurate bills were rendered.

BellSouth has made presentations to several CLECs interested in using AIN Toolkit to develop AIN applications that would run via BellSouth's AIN, and thus on BellSouth's switches. A CLEC that wishes to access BellSouth's AIN service creation tools (that is, AIN Toolkit) for the first time could, however, do so in a matter of seven days provided that the CLEC has an ISDN line and a personal computer.

BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. §51.319(e)(3). This gives CLECs the same access as

BellSouth to develop and deploy AIN services using BellSouth's SMS. Requesting CLECs receive the information necessary to format data and enter the data correctly into the various databases using the associated SMS.

Q. DOES BELLSOUTH MAINTAIN ITS DATABASES IN ACCORDANCE WITH SECTION 222 OBLIGATIONS?

A. Yes. All data in the above databases are maintained in accordance with §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi).

Q. WILL BELLSOUTH CONSIDER OTHER MEANS OF ACCESS TO ITS CALL-RELATED DATABASES?

A. Yes. BellSouth will respond to requests for additional arrangements for access to call-related databases and associated signaling facilities through the BFR process.

Q. PLEASE SUMMARIZE YOUR TESTIMONY ON CALL-RELATED DATABASES.

A. In summary, as required by 47 C.F.R. § 51.319(e), BellSouth provides unbundled, nondiscriminatory access to its signaling networks, to its call-related databases used in signaling networks for billing and collection or for the transmission, routing or other provision of telecommunications services, and to the associated SMS for each database. Each database is accessed through BellSouth's STPs by a requesting CLEC in the same manner and via the same signaling links to the database that are used by BellSouth itself.

Q. DESCRIBE BELLSOUTH'S PROVISION OF NONDISCRIMINATORY ACCESS TO SERVICE MANAGEMENT SYSTEMS.

A. SMS is defined as a computer database or system not part of the public switched network that, among other things: (1) interconnects to the SCP and sends to that SCP the information and call processing instructions needed for a network switch to process and complete a telephone call; and (2) provides telecommunications carriers with the capability of entering and storing data regarding the processing and completing of a telephone call. BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. § 51.319(e)(3). Requesting carriers are provided with the information necessary to format data and enter it into the various databases using the associated SMS. Carriers have the same access as BellSouth to develop AIN services using SMS. All data in the databases described above is maintained in accordance with § 222 of the Act.

CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 11.

A. Section 271(2)(B)(xi) requires that BellSouth generally offer "until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations." BellSouth provides interim number portability in

accordance with these requirements until Local Number Portability ("LNP") is available. *See* Intermedia Agmnt., Att. 5, § 3.0. As of November 19, 2001, 100 % of the BellSouth switches in Tennessee and 100% of the access lines served by BellSouth in Tennessee were LNP capable. Therefore, BellSouth continues to be in compliance with this checklist item.

Q. DESCRIBE BELLSOUTH'S INTERIM NUMBER PORTABILITY OFFER.

A. BellSouth offered interim number portability under the four methods which the FCC had found to be technically feasible: (1) Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID"); (2) Route Index-Portability Hub ("RI-PH"); (3) Directory Number-Route Index ("DN-RI"); and (4) Local Exchange Routing Guide ("LERG") Reassignment. BellSouth provides RI-PH as a comparable arrangement in provisioning interim number portability.

BellSouth ported 47,754 lines in Tennessee using INP. However, as of February 28, 2002, BellSouth had converted 46,480 (97%) of those lines to LNP. In its region, BellSouth ported 117,010 numbers, of which 110,677 (95%) have been converted to LNP as of that same date.

Q. DESCRIBE BELLSOUTH'S PERMANENT NUMBER PORTABILITY OFFER.

A. BellSouth has implemented permanent number portability in Tennessee in accordance with FCC rules. As of November 19, 2001, BellSouth has equipped all 201 of its switches in Tennessee providing 100% of its lines with LNP capability. Also, as of

November 19, 2001, BellSouth has equipped in its nine-state region switches providing 100% of its access lines with LNP capability. Once long-term number portability is implemented in a particular end office, BellSouth and CLECs withdraw interim number portability offers. The transition from interim arrangements to permanent arrangements should be accomplished within 120 days. BellSouth will not charge the CLEC for the conversion from interim to permanent number portability.

As of February 28, 2002, BellSouth had ported 276,197 business directory numbers and 1,166 residence directory numbers in Tennessee using LNP. In its nine-state region, BellSouth had ported 1,749,256 business and 197,254 residence directory numbers as of February 28, 2002, which confirms the availability of LNP.

Q. DESCRIBE THE MEANS BY WHICH CLECs' END USER CUSTOMERS MAY OBTAIN VERIFICATION OR INTERRUPTION OF A TELEPHONE NUMBER THAT HAS BEEN PORTED TO A CLEC SWITCH.

A. BellSouth has developed methods and procedures to be followed when customers want verification or interruption of a conversation involving a telephone number that has been ported to a CLEC's switch. There are two arrangements that a CLEC may elect: (1) BellSouth provides operator call processing on behalf of the CLEC; and (2) the CLEC provides its own operator call processing. When BellSouth handles the CLEC's operator call processing, a verification trunk will be provisioned between the BellSouth operator services platform and the CLEC's network. This will allow BellSouth's operator to verify such a line in a CLEC switch at the request of either a BellSouth or CLEC end user. When the CLEC handles its own operator call processing, a two-way inward

operator trunk (an operator to operator connection) will be jointly provisioned. This will allow the BellSouth operator to contact the CLEC operator. The CLEC operator will verify and/or interrupt the line, and report the condition to the BellSouth operator who will, in turn, report the condition of the line to the end user. This arrangement will likewise allow the CLEC operator to contact the BellSouth operator. The BellSouth operator will verify and/or interrupt the line and report the condition to the CLEC operator who will report the condition of the line to the CLEC's end user.

CHECKLIST ITEM 12: LOCAL DIALING PARITY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 12.

A. Checklist Item 12 obligates BellSouth to provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3). Rule 51.207 states that a LEC shall permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local call notwithstanding the identity of the customer's or the called party's telecommunications service provider. The FCC, in the *Second Louisiana Order*, found BellSouth in compliance with this Checklist Item. Nothing has changed since the FCC's finding and this Authority should likewise find BellSouth compliant with this checklist item.

The FCC's *Second Report and Order*, ¶ 71 stated that local dialing parity also is achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements of Section 251 of the Act.

As described earlier, BellSouth has implemented each of these items in accordance with the Act.

BellSouth's interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC. Further, CLECs'end user customers that have been provisioned utilizing the UNE Platform ("UNE-P") will have available to them local dialing plans in the same manner as BellSouth's retail customers. In addition, BellSouth will not cause CLECs' local service customers to experience inferior quality regarding post-dial delay, call completion rate and transmission quality as compared to BellSouth's local service customers. *See* NewSouth Agmnt., Att. 3, § 5.0. The interconnection of the BellSouth network and the network of the CLEC will be seamless from a customer perspective, unless the CLEC chooses otherwise. While BellSouth is unable to determine the full extent of CLEC dialing policies, BellSouth is not aware of any complaints from CLEC customers that they are required to dial any access codes or additional digits to complete local calls.

CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 13.

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. Reciprocal compensation is discussed further in the testimony of John Ruscilli.

CHECKLIST ITEM 14: RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 14.

A. Checklist Item 14 obligates BellSouth to make telecommunications services available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3). Specifically, BellSouth is required to offer for resale at wholesale rates without unreasonable or discriminatory conditions or limitations any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers. In the *Second Louisiana Order*, the FCC found that but for perceived deficiencies in BellSouth's OSS systems, BellSouth makes telecommunications services available for resale in accordance with sections 251(c)(4) and 252(d)(3). *See Second Louisiana Order* ¶309. With respect to the offering of services for resale, BellSouth continues to meet the requirements of this Checklist Item. See NewSouth Agmnt., Att.1.

Q. ARE CLECs PURCHASING RESOLD SERVICES?

A. Yes. As of February 28, 2002, there were over 80 competing carriers reselling BellSouth's local services to 40,000 customer lines in Tennessee.

Other retail telecommunications services are likewise available for resale. Further discussion of Checklist Item 14 is found in the testimony of John Ruscilli. Mr. Ruscilli also addresses pricing of resold services in Tennessee in his testimony.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared W. Keith Milner –Assistant Vice President – Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 114 pages and 12 exhibit(s).

W. Keith Milner

Sworn to and subscribed
before me on April 26, 2002

NOTARY PUBLIC

Notary Public, Cobb County, Georgia
My Commission Expires June 19, 2005

WKM-1

Exhibit No. WKM – 1

PHYSICAL AND VIRTUAL COLLOCATION FOR TENNESSEE AND BELLSOUTH

SPACE TYPE CODES	STATUS CODES	IN PROGRESS	IN SERVICE
A - Caged Non-specific	EA - Early Acceptance	EA+FB+FM	RC+SA+SC+SR+TM
B - Caged Construction by Bellsouth	FB - Firm Order Bona Fide		
V - Caged Construction by Vendor	FM - Permit Hold		
C - Cageless Convential	RC - Request Complete		
L - Cageless Non-specific	SA - Space Accepted		
N - Cageless Non-conventional	SC - Commenced		
D - Virtual	SR - Space Ready		
U - Unknown	TM - Termination		

Count of RefNum			Status								
Application Type Code	Area Code	Space	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
M	TN	U							1		1
	TN Total								1		1
M Total									1		1
PHYSICAL	AL	A					74		8	12	94
		C		1							1
		L					188		44	4	236
		U					1				1
		V							1		1
	AL Total			1			263		53	16	333
	GA	A		1			164		15		180
		B		3			1		1		5
		C		1			14		4		19
		L					232		73		305
		U		1			9				10
		V					8				8
	GA Total			6			428		93		527
	KY	A					41		11	9	61
		C							1		1
		L					67		2	2	71
		U					9		1		10
	KY Total						117		15	11	143
	LA	A					99		1	13	113
		C				18	7		1		26
		L		2			217		10		229
		U					3				3

Count of RefNum			Status								
Application Type Code	Area Code	Space	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		V				1					1
	LA Total			2		19	326		12	13	372
	MS	A					13		2		15
		C					5		2		7
		L	3				69		9		81
		U					4				4
		V				5					5
	MS Total		3			5	91		13		112
	NC	A		1			185		1	21	208
		B					2				2
		C					14				14
		L		1			337		5	8	351
		U					1				1
	NC Total			2			539		6	29	576
	PMFLNORTH	A					133		7	16	156
		B					1		1		2
		C				6	19		1		26
		L					334		9	10	353
		U					5				5
	PMFLNORTH Total					6	492		18	26	542
	PMFLSOUTH	A					317		15	30	362
		B	4		1		8				13
		C		1		15	27		2		45
		L					345		7	3	355
		U					13				13
	PMFLSOUTH Total		4	1	1	15	710		24	33	788
	SC	A					91		1		92
		B					1				1
		C					7		3		10
		L					167		2		169
		V		1							1
	SC Total			1			266		6		273
	TN	A					140		18	17	175
		C		2			5				7
		L					225		55	6	286
		V							10		10
	TN Total			2			370		83	23	478
PHYSICAL Total			7	15	1	45	3602		323	151	4144
VIRTUAL	AL	D						15			15
	AL Total							15			15

Count of RefNum			Status								
Application Type Code	Area Code	Space	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
	GA	D		9				103	2		114
	GA Total			9				103	2		114
	KY	D		2				1	1		4
	KY Total			2				1	1		4
	LA	D						14	12		26
	LA Total							14	12		26
	MS	D						6	2		8
	MS Total							6	2		8
	NC	D						75	3		78
	NC Total							75	3		78
	PMFLNORTH	D				5		80			85
	PMFLNORTH Total					5		80			85
	PMFLSOUTH	D				44		26	9		79
	PMFLSOUTH Total					44		26	9		79
	SC	D						12	1		13
	SC Total							12	1		13
	TN	D		1				8	3		12
	TN Total			1				8	3		12
V IRTUAL Total				12		49		340	33		434
BellSouth Grand Total			7	27	1	94	3602	340	357	151	4579

PHYSICAL AND VIRTUAL COLLOCATION FOR TENNESSEE AND BELLSOUTH (CITIES AND WIRE CENTERS)												
Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
M	TN	NASHVILLE	NSVL-MAIN							1		1
		NASHVILLE Total								1		1
	TN Total									1		1
M Total										1		1
PHYSICAL	AL	ALABASTER	ALABASTER					4			1	5
		ALABASTER Total						4			1	5
		ALBERTVILLE	ALBERTVILLE					1				1
		ALBERTVILLE Total						1				1
		ANNISTON	ANNISTON-LENLOCK					1				1
			ANNISTON-M&T					2		1		3
		ANNISTON Total						3		1		4
		ATHENS	ATHENS-MAIN					1		2		3
		ATHENS Total						1		2		3
		AUBURN	AUBURN					1		1		2
		AUBURN Total						1		1		2
		BESSEMER	BESS-MAIN					8			1	9
		BESSEMER Total						8			1	9
		BIRMINGHAM	BHAM-CAHABA HGTS					11			1	12
			BHAM-CENTER PT					6			1	7
			BHAM-EASTLAKE					5		1		6
			BHAM-FIVE POINTS					8		1	1	10
			BHAM-MAIN & TOLL					14		1	1	16
			BHAM-OAK MT					5			1	6
			BHAM-WEST END					3				3
			BHAM-WOODLAWN					7			1	8
		BIRMINGHAM Total						59		3	6	68
		CULLMAN	CULL-MAIN							1		1
		CULLMAN Total								1		1
		DECATUR	DECATUR					2		2		4
		DECATUR Total						2		2		4
		ENSLEY	BHAM-ENSLEY					5			1	6
		ENSLEY Total						5			1	6
		FAIRHOPE	FAIRHOPE					2				2
		FAIRHOPE Total						2				2
		FLORENCE	FLORENCE					1		1		2
		FLORENCE Total						1		1		2
		FORESTDALE	BHAM-FORESTDALE					1				1
		FORESTDALE Total						1				1
		GADSDEN	GADSD-M&T					2		1		3

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		GADSDEN Total						2		1		3
		GARDENDALE	GARDENDALE					2				2
		GARDENDALE Total						2				2
		HOMEWOOD	BHAM-HOMEWOOD					13		2	1	16
			BHAM-OXMOOR					11			1	12
		HOMEWOOD Total						24		2	2	28
		HOOVER	BHAM-RIVERCHASE					10		1	1	12
		HOOVER Total						10		1	1	12
		HUEYTOWN	BESS-HUEYTOWN					2				2
		HUEYTOWN Total						2				2
		HUNTSVILLE	HUNTS-LAKEWOOD					4		1		5
			HUNTS-M&T					7		2		9
			HUNTS-PARKWAY					6		1		7
			HUNTS-RESEARCH W					1				1
			HUNTS-UNIVERSITY					5		2		7
			MADISON					1		1		2
		HUNTSVILLE Total						24		7		31
		IRONDALE	BHAM-EASTWOOD					5			1	6
		IRONDALE Total						5			1	6
		JACKSONVILLE	JACKSONVILLE					1				1
		JACKSONVILLE Total						1				1
		MOBILE	MOBL-AIRPORT					5				5
			MOBL-AZALEA		1			10		3		14
			MOBL-OLD SHELL					9		2		11
			MOBL-SKYLINE					6		3		9
			MOBL-SPRINGHILL					7		3		10
		MOBILE Total			1			37		11		49
		MONTGOMERY	MONT-DALRAIDA					11		2		13
			MONT-M&T					10		3		13
			MONT-NORMANDALE					8		3		11
		MONTGOMERY Total						29		8		37
		NORTHPORT	TUSCA-NORTHPORT					1				1
		NORTHPORT Total						1				1
		OPELIKA	OPELIKA					1		1		2
		OPELIKA Total						1		1		2
		OXFORD	ANNISTON-OXFORD					1				1
		OXFORD Total						1				1
		PHENIX CITY	PHNIX CY-MAIN					1		1		2
		PHENIX CITY Total						1		1		2
		PRATTVILLE	PRATTVILLE					2		1		3
		PRATTVILLE Total						2		1		3

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		PRICHARD	MOBL-PRICHARD					5		1		6
		PRICHARD Total						5		1		6
		SARALAND	MOBL-SARALAND					3				3
		SARALAND Total						3				3
		SELMA	SELMA							1		1
		SELMA Total								1		1
		SEMMES	MOBL-SEMMES					1				1
		SEMMES Total						1				1
		SHEFFIELD	SHEFFIELD					1		2		3
		SHEFFIELD Total						1		2		3
		SPANISH FORT	MOBL-SPANISH FT					4				4
		SPANISH FORT Total						4				4
		TARRANT	BHAM-TARRANT					3			2	5
		TARRANT Total						3			2	5
		TUSCALOOSA	TUSCA-DRUID HILL					2		2		4
			TUSCA-M&T					5		2		7
		TUSCALOOSA Total						7		4		11
		VESTAVIA HILLS	BHAM-VALLEY					9		1	1	11
		VESTAVIA HILLS Total						9		1	1	11
	AL Total				1			263		53	16	333
	GA	ACWORTH	ACWORTH MAIN					1		2		3
		ACWORTH Total						1		2		3
		ALBANY	ALBANY MAIN					3				3
		ALBANY Total						3				3
		ALPHARETTA	ALPHARETTA MAIN					8		2		10
		ALPHARETTA Total						8		2		10
		AMERICUS	AMERICUS MAIN					1				1
		AMERICUS Total						1				1
		ATHENS	ATHENS MAIN		1			1		2		4
		ATHENS Total			1			1		2		4
		ATLANTA	ADAMSVILLE					3		1		4
			BEN HILL					3				3
			BUCKHEAD					6		4		10
			COURTLAND STREET					28		6		34
			GRESHAM					2		2		4
			HOLLYWOOD RD					2		1		3
			LAKEWOOD					2				2
			PEACHTREE PLACE					22		1		23
			SANDY SPRINGS					6		2		8
			TOCO HILLS		1			10		2		13
			WEST END					3				3

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
			WOODLAND					7		1		8
		ATLANTA Total			1			94		20		115
		AUGUSTA	AUGUSTA FLEMING					4		1		5
			AUGUSTA MAIN		1			7		4		12
			AUGUSTA MARTINEZ					6		2		8
			AUGUSTA THE HILL					5		2		7
		AUGUSTA Total			1			22		9		32
		AUSTELL	AUSTELL		1			8				9
		AUSTELL Total			1			8				9
		BAXLEY	BAXLEY MAIN					1				1
		BAXLEY Total						1				1
		BLACKSHEAR	BLACKSHEAR MAIN							1		1
		BLACKSHEAR Total								1		1
		BRUNSWICK	BRUNSWICK MAIN							1		1
		BRUNSWICK Total								1		1
		BUFORD	BUFORD ESS					1		2		3
		BUFORD Total						1		2		3
		CARROLLTON	CARROLLTON MAIN					3				3
		CARROLLTON Total						3				3
		CARTERSVILLE	CARTERSVILLE MAIN					2				2
		CARTERSVILLE Total						2				2
		CHAMBLEE	CHAMBLEE MAIN		1			13		3		17
		CHAMBLEE Total			1			13		3		17
		CLARKSTON	INDIAN CREEK					1		2		3
		CLARKSTON Total						1		2		3
		COLLEGE PARK	RIVERDALE					2				2
		COLLEGE PARK Total						2				2
		COLUMBUS	COLUMBUS BAKER VILLA					1				1
			COLUMBUS MAIN					2				2
			COLUMBUS MEADOWOOD					2		1		3
		COLUMBUS Total						5		1		6
		CONYERS	CONYERS MAIN					8				8
		CONYERS Total						8				8
		COVINGTON	COVINGTON MAIN					2				2
		COVINGTON Total						2				2
		CUMMING	CUMMING MAIN					6				6
		CUMMING Total						6				6
		DECATUR	COLUMBIA DRIVE					2		1		3
			EAST LAKE					3		3		6
		DECATUR Total						5		4		9
		DOUGLASVILLE	DOUGLASVILLE MAIN					6		1		7

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		DOUGLASVILLE Total						6		1		7
		DUBLIN	DUBLIN MAIN					1				1
		DUBLIN Total						1				1
		DULUTH	DULUTH ESS					11				11
		DULUTH Total						11				11
		DUNWOODY	DUNWOODY					17		4		21
		DUNWOODY Total						17		4		21
		EAST POINT	EAST POINT		1			12		1		14
		EAST POINT Total			1			12		1		14
		ELBERTON	ELBERTON MAIN							1		1
		ELBERTON Total								1		1
		FAYETTEVILLE	FAYETTEVILLE ESS					1				1
		FAYETTEVILLE Total						1				1
		FOREST PARK	FOREST PARK					6				6
		FOREST PARK Total						6				6
		GAINESVILLE	GAINESVILLE MAIN					2		1		3
		GAINESVILLE Total						2		1		3
		GARDEN CITY	SAV.GARDEN CITY					2				2
		GARDEN CITY Total						2				2
		GRIFFIN	GRIFFIN MAIN					3				3
		GRIFFIN Total						3				3
		HAZLEHURST	HAZLEHURST MAIN					1				1
		HAZLEHURST Total						1				1
		JONESBORO	JONESBORO					5				5
		JONESBORO Total						5				5
		LAWRENCEVILLE	LAWRENCEVILLE					4		3		7
		LAWRENCEVILLE Total						4		3		7
		LILBURN	LILBURN					9		2		11
		LILBURN Total						9		2		11
		LITHONIA	PANOLA ROAD					5				5
		LITHONIA Total						5				5
		LOGANVILLE	LOGANVILLE ESS					1				1
		LOGANVILLE Total						1				1
		MACON	MACON MAIN					4				4
			MACON VINEVILLE					2				2
		MACON Total						6				6
		MARIETTA	MARIETTA EAST					11		1		12
			MARIETTA MAIN					21		2		23
			POWERS FERRY					9		4		13
		MARIETTA Total						41		7		48
		MCDONOUGH	MCDONOUGH DMS					1				1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		MCDONOUGH Total						1				1
		MORROW	MORROW					1				1
		MORROW Total						1				1
		NEWNAN	NEWNAN MAIN					3				3
		NEWNAN Total						3				3
		NORCROSS	NORCROSS					9		6		15
		NORCROSS Total						9		6		15
		PEACHTREE CITY	PEACHTREE CITY					3				3
		PEACHTREE CITY Total						3				3
		POWDER SPRINGS	POWDER SPRINGS ESS					2				2
		POWDER SPRINGS Total						2				2
		ROME	ROME EAST					2				2
		ROME Total						2				2
		ROSWELL	ROSWELL MAIN					12		5		17
		ROSWELL Total						12		5		17
		SAVANNAH	SAV.BULL STREET					6		5		11
			SAV.DERENNE					6				6
			SAV.WHITE BLUFF					5				5
			SAV.WILMINGTON ISLAN					1		1		2
			SKIDAWAY ISLAND MAIN							1		1
		SAVANNAH Total						18		7		25
		SMYRNA	SMYRNA					14		2		16
		SMYRNA Total						14		2		16
		SNELLVILLE	SNELLVILLE					8		1		9
		SNELLVILLE Total						8		1		9
		STOCKBRIDGE	STOCKBRIDGE ESS					1				1
		STOCKBRIDGE Total						1				1
		STONE MOUNTAIN	STONE MOUNTAIN					4				4
		STONE MOUNTAIN Total						4				4
		THOMASVILLE	THOMASVILLE MAIN							1		1
		THOMASVILLE Total								1		1
		THOMSON	THOMSON MAIN							1		1
		THOMSON Total								1		1
		TIFTON	TIFTON					1				1
		TIFTON Total						1				1
		TUCKER	TUCKER					15		1		16
		TUCKER Total						15		1		16
		VALDOSTA	VALDOSTA MAIN					2				2
		VALDOSTA Total						2				2
		VIDALIA	VIDALIA MAIN					2				2
		VIDALIA Total						2				2

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		WARNER ROBINS	WARNER ROBINS MAIN					2				2
		WARNER ROBINS Total						2				2
		WAYCROSS	WAYCROSS MAIN					1				1
		WAYCROSS Total						1				1
		WOODSTOCK	WOODSTOCK ESS					7				7
		WOODSTOCK Total						7				7
	GA Total				6			428		93		527
	KY	BARDSTOWN	BARDSTOWN							1		1
		BARDSTOWN Total								1		1
		BOWLING GREEN	BOWLING GREEN					2				2
		BOWLING GREEN Total						2				2
		DANVILLE	DANVILLE							1		1
		DANVILLE Total								1		1
		FRANKFORT	FRANKFORT-MAIN					3				3
		FRANKFORT Total						3				3
		GEORGETOWN	GEORGETOWN					2				2
		GEORGETOWN Total						2				2
		HENDERSON	HENDERSON					2				2
		HENDERSON Total						2				2
		HOPKINSVILLE	HOPKINSVILLE					1		1		2
		HOPKINSVILLE Total						1		1		2
		LOUISVILLE	LOU-26TH ST					6		2	1	9
			LOU-ANCHORAGE					10			1	11
			LOU-ARMORY PLACE					11		3	1	15
			LOU-BARDSTOWN RD					9		1	1	11
			LOU-BEECHMONT					8				8
			LOU-FERN CREEK					3				3
			LOU-HARRODS CRK					1				1
			LOU-JTOWN					4		1	1	6
			LOU-OKOLONA					9			1	10
			LOU-SHIVELY					4			1	5
			LOU-SIX MILE LN					9		1	1	11
			LOU-ST.MATTHEWS					9		1	1	11
			LOU-THIRD STREET					7		1	1	9
			LOU-VALLEY STA.					3		1		4
			LOU-WESTPORT RD					3		1	1	5
		LOUISVILLE Total						96		12	11	119
		MADISONVILLE	MADISONVILLE					2				2
		MADISONVILLE Total						2				2
		OWENSBORO	OWENSBORO					2				2
		OWENSBORO Total						2				2

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		PADUCAH	PADUCAH-MAIN					2				2
		PADUCAH Total						2				2
		RICHMOND	RICHMOND					2				2
		RICHMOND Total						2				2
		SHELBYVILLE	SHELBYVILLE					1				1
		SHELBYVILLE Total						1				1
		WINCHESTER	WINCHESTER					2				2
		WINCHESTER Total						2				2
	KY Total							117		15	11	143
	LA	ABBEVILLE	ABBEVILLE				1	1				2
		ABBEVILLE Total					1	1				2
		ALEXANDRIA	ALEX-MAIN					3		1		4
		ALEXANDRIA Total						3		1		4
		BATON ROUGE	BT.RG.-BAKER					2				2
			BT.RG.-GOODWOOD					11		2		13
			BT.RG.-HOOPER					1				1
			BT.RG.-ISTROUMA				1	4				5
			BT.RG.-MAIN					11		1		12
			BT.RG.-OAK HILLS					8				8
			BT.RG.-SHERWOOD					7				7
			BT.RG.-SUBURBAN					9				9
			BT.RG.-WOODLAWN					7				7
		BATON ROUGE Total					1	60		3		64
		BOSSIER CITY	SHPT-BOSSIER					7				7
		BOSSIER CITY Total						7				7
		BROUSSARD	BROUSSARD					5				5
		BROUSSARD Total						5				5
		CHALMETTE	N.O.-CHALMETTE				1	5			1	7
		CHALMETTE Total					1	5			1	7
		COVINGTON	COVINGTON				1	5				6
		COVINGTON Total					1	5				6
		DENHAM SPRINGS	DENHAM SPRINGS				1	2				3
		DENHAM SPRINGS Total					1	2				3
		DESTREHAN	NORCO					1				1
		DESTREHAN Total						1				1
		GRETNA	N.O.-RIVERSIDE				1	9			1	11
		GRETNA Total					1	9			1	11
		HAMMOND	HAMMOND					1				1
		HAMMOND Total						1				1
		HOUMA	HOUMA					7				7
		HOUMA Total						7				7

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		KENNER	KENNER-BRIARWOOD					11			1	12
		KENNER Total						11			1	12
		LAFAYETTE	LAF-MAIN		1			13		1		15
			LAF-VERMILION					10				10
		LAFAYETTE Total			1			23		1		25
		LAKE CHARLES	LKCH-DOWNTOWN		1			6				7
			LKCH-UNIVERSITY					6		1		7
		LAKE CHARLES Total			1			12		1		14
		LAPLACE	LAPLACE					1				1
		LAPLACE Total						1				1
		MANDEVILLE	MANDEVILLE				1	5				6
		MANDEVILLE Total					1	5				6
		MARRERO	N.O.-MARRERO				1	7			1	9
		MARRERO Total					1	7			1	9
		METAIRIE	N.O.-METAIRIE					16		1	1	18
			N.O.-SHREWSBURY				1	13			1	15
		METAIRIE Total					1	29		1	2	33
		MONROE	MONR-DESIARD					3				3
			MONR-MAIN					4				4
		MONROE Total						7				7
		MORGAN CITY	MGN.CITY-INGLWD					3				3
		MORGAN CITY Total						3				3
		NATCHITOCHES	NATCH-MAIN					2				2
		NATCHITOCHES Total						2				2
		NEW IBERIA	NEW IBERIA					6				6
		NEW IBERIA Total						6				6
		NEW ORLEANS	N.O.-AURORA				1	4			1	6
			N.O.-BROADMOOR				1	3				4
			N.O.-CARROLLTON				1	3				4
			N.O.-FRANKLIN				1	4			1	6
			N.O.-LAKE				1	4				5
			N.O.-MAIN				1	16		1	1	19
			N.O.-MID CITY				1	9			1	11
			N.O.-SEABROOK				1	7			1	9
			N.O.-ST. CHARLES				1	8				9
		NEW ORLEANS Total					9	58		1	5	73
		OPELOUSAS	OPELOUSAS				1	2				3
		OPELOUSAS Total					1	2				3
		RIVER RIDGE	KENNER-HARAHAN					10		1	1	12
		RIVER RIDGE Total						10		1	1	12
		RUSTON	RUSTON					1		1		2

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		RUSTON Total						1		1		2
		SHREVEPORT	SHPT-COLLEGE					3				3
			SHPT-MAIN					8		1		9
			SHPT-QUEENSBORO					5				5
			SHPT-SO.HIGHLDS					7				7
			SHPT-SUM GROVE					7				7
		SHREVEPORT Total						30		1		31
		SLIDELL	SLIDELL					7			1	8
		SLIDELL Total						7			1	8
		SULPHUR	LKCH-MAPLEWOOD					2				2
			SULPHUR					1				1
		SULPHUR Total						3				3
		THIBODAUX	THIBODAUX					1				1
		THIBODAUX Total						1				1
		WEST MONROE	MONR-WEST MONROE					2		1		3
		WEST MONROE Total						2		1		3
	LA Total				2		19	326		12	13	372
	MS	BILOXI	BILX EDGEWATER					4		2		6
			BILX HOWARD AVE					4		1		5
		BILOXI Total						8		3		11
		BRANDON	BRANDON				1	2				3
		BRANDON Total					1	2				3
		CLARKSDALE	CLARKSDALE					1				1
		CLARKSDALE Total						1				1
		COLUMBUS	COLUMBUS					3				3
		COLUMBUS Total						3				3
		GREENVILLE	GREENVILLE					1				1
		GREENVILLE Total						1				1
		GREENWOOD	GNWD MAIN	1				1				2
		GREENWOOD Total		1				1				2
		GULFPORT	GLPT 22ND AVE					5		2		7
			GLPT LYMAN					1				1
		GULFPORT Total						6		2		8
		HATTIESBURG	HATTIESBURG MAIN					4		1		5
			HATTIESBURG WEST					3		1		4
		HATTIESBURG Total						7		2		9
		JACKSON	JCS BELVEDERE					3				3
			JCS CAP PEARL				1	9		1		11
			JCS CLINTON BLVD					6				6
			JCS MEADOWBROOK					7				7
			JCS RIDGEWOOD				1	6		1		8

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		JACKSON Total					2	31		2		35
		LAUREL	LAUREL MAIN					3				3
		LAUREL Total						3				3
		LUCEDALE	LUCEDALE					1				1
		LUCEDALE Total						1				1
		MCCOMB	MCCOMB	1								1
		MCCOMB Total		1								1
		MERIDIAN	MRD 23RD AVE				1	4				5
		MERIDIAN Total					1	4				5
		NATCHEZ	NATCHEZ					1				1
		NATCHEZ Total						1				1
		OXFORD	OXFORD					2				2
		OXFORD Total						2				2
		PASCAGOULA	PSCG MAIN					2				2
		PASCAGOULA Total						2				2
		PEARL	JCS PEARL CITY					7		1		8
		PEARL Total						7		1		8
		RIDGELAND	MADISON				1	1				2
		RIDGELAND Total					1	1				2
		RIPLEY	RIPLEY							1		1
		RIPLEY Total								1		1
		STARKVILLE	SKVL MAIN					3		2		5
		STARKVILLE Total						3		2		5
		TUNICA	TUNICA					1				1
		TUNICA Total						1				1
		TUPELO	TUPL MAIN	1				4				5
		TUPELO Total		1				4				5
		VICKSBURG	VICKSBURG					2				2
		VICKSBURG Total						2				2
	MS Total			3			5	91		13		112
	NC	APEX	APEX-CENTRAL					7		1		8
		APEX Total						7		1		8
		ARDEN	ARDN-CENTRAL					2				2
		ARDEN Total						2				2
		ASHEVILLE	AHVL-BILTMORE					3				3
			AHVL-O HENRY					6				6
			AHVL-OTEEN					2				2
		ASHEVILLE Total						11				11
		BOONE	BOONE-KING					1				1
		BOONE Total						1				1
		BURGAW	BURGAW-MAIN					1				1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		BURGAW Total						1				1
		BURLINGTON	BURLINGTON-DAVIS					9			1	10
		BURLINGTON Total						9			1	10
		CARY	CARY-CENTRAL		1			16				17
			CARY-WESTON								1	1
		CARY Total			1			16			1	18
		CHAPEL HILL	CHAPEL HILL-ROSEMARY					19				19
		CHAPEL HILL Total						19				19
		CHARLOTTE	CHARLOTTE-CALDWELL					26			1	27
			CHARLOTTE-CARMEL					14			1	15
			CHARLOTTE-DERITA					15		1	1	17
			CHARLOTTE-ERWIN RD					9			1	10
			CHARLOTTE-LAKE POINT					6			1	7
			CHARLOTTE-REID					17			1	18
			CHARLOTTE-S BLVD					20			1	21
			CHARLOTTE-UNIVERSITY					14			1	15
			CHRL-CENTRAL AVE.					18			1	19
			CHRL-SHARON AMITY					19			1	20
			CHRL-THOMASBORO					16			1	17
		CHARLOTTE Total						174		1	11	186
		CLEMMONS	WNSL-CLEMMONS					3				3
		CLEMMONS Total						3				3
		DALLAS	GASTONIA-DALLAS					1				1
		DALLAS Total						1				1
		DAVIDSON	DAVIDSON-POTTS					3			1	4
		DAVIDSON Total						3			1	4
		ELON COLLEGE	BURLINGTON-ELON					1			1	2
		ELON COLLEGE Total						1			1	2
		FOREST CITY	FOREST CITY-CENTRAL					1				1
		FOREST CITY Total						1				1
		GARNER	RLGH-GARNER					11			1	12
		GARNER Total						11			1	12
		GASTONIA	GASTONIA-SOUTH ST					17			1	18
		GASTONIA Total						17			1	18
		GOLDSBORO	GOLDSBORO-ADAMSVILLE					2				2
			GOLDSBORO-MAIN					3				3
		GOLDSBORO Total						5				5
		GREENSBORO	GNBO-AIRPORT					8			1	9
			GNBO-ASHLAND DR.					19			1	20
			GNBO-EUGENE					22		1	1	24
			GNBO-LAWNDALE					10				10

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
			GNBO-MCKNIGHT MILL					4				4
		GREENSBORO Total						63		1	3	67
		HENDERSONVILLE	HNVL-CHURCH ST					2				2
		HENDERSONVILLE Total						2				2
		HUNTERSVILLE	HUNTERSVILLE-CENTRAL					3				3
		HUNTERSVILLE Total						3				3
		KNIGHTDALE	KNIGHTDALE-CENTRAL					2				2
		KNIGHTDALE Total						2				2
		LAURINBURG	LAURINBURG-MAIN					1				1
		LAURINBURG Total						1				1
		LENOIR	LENOIR-HARPER					1				1
		LENOIR Total						1				1
		LINCOLNTON	LINCOLNTON-MAIN					3			1	4
		LINCOLNTON Total						3			1	4
		LOWELL	LOWELL-MAIN					2				2
		LOWELL Total						2				2
		LUMBERTON	LUMBERTON-MAIN					2				2
		LUMBERTON Total						2				2
		MINT HILL	CHARLOTTE-MINT HILL					2				2
		MINT HILL Total						2				2
		MORGANTON	MGTN-SOUTH GREEN					1				1
		MORGANTON Total						1				1
		MOUNT HOLLY	MOUNT HOLLY-MAIN					2				2
		MOUNT HOLLY Total						2				2
		MOUNT OLIVE	MT. OLIVE-CENTRAL					1				1
		MOUNT OLIVE Total						1				1
		NEWTON	NEWTON-MAIN					2				2
		NEWTON Total						2				2
		RALEIGH	RLGH-AIRPORT					1				1
			RLGH-GLENWOOD					19				19
			RLGH-JONES FRANKLIN					16				16
			RLGH-MORGAN		1			20				21
			RLGH-NEW HOPE					19		1	1	21
			RLGH-SIX FORKS					13				13
			RLGH-SUNNYBROOK					5			1	6
		RALEIGH Total			1			93		1	2	97
		REIDSVILLE	REIDSVILLE-MAIN					3				3
		REIDSVILLE Total						3				3
		RUTHERFORDTON	RTTN-CENTRAL					1		1		2
		RUTHERFORDTON Total						1		1		2
		SALISBURY	SALISBURY-MAIN					10			1	11

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		SALISBURY Total						10			1	11
		SHELBY	SHELBY-MAIN					3				3
		SHELBY Total						3				3
		STATESVILLE	STATESVILLE-MAIN					2				2
		STATESVILLE Total						2				2
		WAYNESVILLE	WAYNESVILLE-MAIN					1				1
		WAYNESVILLE Total						1				1
		WENDELL	WENDELL-PINE								1	1
		WENDELL Total									1	1
		WILMINGTON	WLMG-FOURTH ST.					7				7
			WLMG-WINTER PARK					6				6
			WRIGHTSVILLE-MAIN					2				2
		WILMINGTON Total						15				15
		WINSTON SALEM	WNSL-WHITAKER PK					2				2
		WINSTON SALEM Total						2				2
		WINSTON-SALEM	WNSL-FIFTH ST.					15		1	1	17
			WNSL-GLENN AVE.					4			1	5
			WNSL-LEXINGTON					6				6
			WNSL-VINEYARD					14			1	15
		WINSTON-SALEM Total						39		1	3	43
		ZEBULON	ZEBULON-CENTRAL					1			1	2
		ZEBULON Total						1			1	2
	NC Total				2			539		6	29	576
	PMFLNOR	BROOKSVILLE	BROOKSVILLE					2			1	3
		BROOKSVILLE Total						2			1	3
		COCOA	COCOA-MAIN					9				9
		COCOA Total						9				9
		COCOA BEACH	COCOA BEACH					4				4
		COCOA BEACH Total						4				4
		DAYTONA BEACH	DYBH-FENTRESS					1				1
			DYBH-MAIN					10		1		11
		DAYTONA BEACH Total						11		1		12
		DELAND	DELAND					4		1		5
		DELAND Total						4		1		5
		FERNANDINA BEACH	FERNANDINA BEACH					3			1	4
		FERNANDINA BEACH Total						3			1	4
		FORT PIERCE	FORT PIERCE MAIN					6				6
		FORT PIERCE Total						6				6
		GAINESVILLE	GSVL-MAIN					13				13
			GSVL-NORTHWEST					3				3
		GAINESVILLE Total						16				16

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		GULF BREEZE	GULF BREEZE					1				1
		GULF BREEZE Total						1				1
		HEATHROW	LAKE MARY - HEATHROW					5				5
		HEATHROW Total						5				5
		HOBE SOUND	HOBE SOUND MAIN					1				1
		HOBE SOUND Total						1				1
		INDIAN HARBOUR BEACH	EGLL-INDIAN HRBR BCH					3				3
		INDIAN HARBOUR BEACH Total						3				3
		JACKSONVILLE	JCVL-ARLINGTON					12			1	13
			JCVL-BEACHWOOD					12			1	13
			JCVL-CLAY STREET MGO					25			1	26
			JCVL-FORT CAROLINE					6				6
			JCVL-LAKE FOREST					9			1	10
			JCVL-NORMANDY					12			1	13
			JCVL-OCEANWAY					4			1	5
			JCVL-RIVERSIDE					14			1	15
			JCVL-SAN JOSE					17			1	18
			JCVL-SAN MARCO					17			1	18
			JCVL-SOUTHPOINT					1				1
			JCVL-WESCONNETT					13			1	14
			MNDR-AVENUES					7			1	8
		JACKSONVILLE Total						149			11	160
		JACKSONVILLE BEACH	JCBH-MAIN					13			1	14
		JACKSONVILLE BEACH Total						13			1	14
		JENSEN BEACH	HUTCHINSON IS. MAIN					1				1
		JENSEN BEACH Total						1				1
		LYNN HAVEN	LYNNHAVEN					1				1
		LYNN HAVEN Total						1				1
		MANDARIN	MNDR-LORETTO					11		2	1	14
		MANDARIN Total						11		2	1	14
		MELBOURNE	EGLL-BOWE GARDENS					6				6
			MELBOURNE					11		1		12
		MELBOURNE Total						17		1		18
		MERRITT ISLAND	COCOA-MERRITT ISLAND					4				4
		MERRITT ISLAND Total						4				4
		MILTON	MILTON RAVINE					2				2
		MILTON Total						2				2
		NEW SMYRNA BEACH	NEW SMYRNA BCH					4				4
		NEW SMYRNA BEACH Total						4				4
		ORANGE PARK	ORPK-MAIN					10			1	11
			ORPK-RIDGEWOOD					4				4

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		ORANGE PARK Total						14			1	15
		ORLANDO	ORLD-AZALEA PARK				1	13			1	15
			ORLD-COLONIAL				1	17		1	1	20
			ORLD-MAGNOLIA				1	30		1	1	33
			ORLD-PINECASTLE				1	17		3	1	22
			ORLD-PINEHILLS				1	15			1	17
			ORLD-SAND LAKE				1	16		1	1	19
		ORLANDO Total					6	108		6	6	126
		ORMOND BEACH	DYBH-ORMOND BEACH					5		1		6
		ORMOND BEACH Total						5		1		6
		OVIEDO	OVIEDO					3			1	4
		OVIEDO Total						3			1	4
		PACE	PACE PINE VILLA					2				2
		PACE Total						2				2
		PALATKA	PALATKA					1				1
		PALATKA Total						1				1
		PANAMA CITY	PANAMA CITY CALLAWAY					1				1
			PANAMA CITY MAIN					4				4
		PANAMA CITY Total						5				5
		PANAMA CITY BEACH	PANAMA CITY BEACH					3				3
		PANAMA CITY BEACH Total						3				3
		PENSACOLA	PNSC-BELMONT					12		1		13
			PNSC-FERRY PASS					7		1		8
			PNSC-HILLCREST					1				1
			PNSC-WARRINGTON					8				8
		PENSACOLA Total						28		2		30
		PONTE VEDRA BEACH	PONTE VEDRA BCH					5			1	6
		PONTE VEDRA BEACH Total						5			1	6
		PORT ORANGE	DYBH-PORT ORANGE					6		3		9
		PORT ORANGE Total						6		3		9
		PORT SAINT LUCIE	PORT ST. LUCIE MAIN					2				2
			PTSL SOUTH PTSL					2				2
		PORT SAINT LUCIE Total						4				4
		SAINT AUGUSTINE	STAG-MAIN					10				10
			STAG-SHORES					1				1
			STAG-WORLDGOLF							1	1	2
		SAINT AUGUSTINE Total						11		1	1	13
		SANFORD	SANFORD-O-WS					10			1	11
		SANFORD Total						10			1	11
		SEBASTIAN	SEBASTIAN MAIN					1				1
		SEBASTIAN Total						1				1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		SPRING HILL	WWSP-SPRING HILL					1				1
		SPRING HILL Total						1				1
		STUART	STUART MAIN					6				6
		STUART Total						6				6
		TITUSVILLE	TITUSVILLE					7				7
		TITUSVILLE Total						7				7
		VERO BEACH	VERO BEACH MAIN					5				5
		VERO BEACH Total						5				5
	PMFLNORTH Total						6	492		18	26	542
	PMFLSOU	BOCA RATON	BCRT BOCA TEECA					14		2	2	18
			BCRT SANDALFOOT				1	9			1	11
			BOCA RATON MAIN			1		18			1	20
		BOCA RATON Total				1	1	41		2	4	49
		BOYNTON BEACH	BOYNTON BEACH MAIN				1	11			1	13
		BOYNTON BEACH Total					1	11			1	13
		COCONUT CREEK	PMBH MARGATE					15				15
		COCONUT CREEK Total						15				15
		CORAL GABLES	MIAM ALHAMBRA					19				19
		CORAL GABLES Total						19				19
		CORAL SPRINGS	PMBH CORAL SPRINGS					12				12
		CORAL SPRINGS Total						12				12
		DEERFIELD BEACH	DEERFIELD BEACH MAIN					10		2	1	13
		DEERFIELD BEACH Total						10		2	1	13
		DELRAY BEACH	DELRAY BEACH MAIN				1	9			1	11
			DLBH KINGS POINT				1	6			1	8
		DELRAY BEACH Total					2	15			2	19
		FORT LAUDERDALE	FT LAUD MAIN RELIEF					24			1	25
			FTLD CORAL RIDGE					15			1	16
			FTLD CYPRESS					17		1	1	19
			FTLD WESTON					7				7
		FORT LAUDERDALE Total						63		1	3	67
		HALLANDALE	HLWD HALLANDALE					8		1		9
		HALLANDALE Total						8		1		9
		HIALEAH	MIAM HIALEAH					19				19
		HIALEAH Total						19				19
		HOLLYWOOD	HLWD WEST HOLLYWOOD					18		1		19
			HOLLYWOOD MAIN					14		1		15
		HOLLYWOOD Total						32		2		34
		HOMESTEAD	HOMESTEAD MAIN					2			1	3
		HOMESTEAD Total						2			1	3
		JUPITER	JUPITER MAIN					7			1	8

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		JUPITER Total						7			1	8
		KEY BISCAYNE	MIAM KEY BISCAYNE					2				2
		KEY BISCAYNE Total						2				2
		LAKE WORTH	WPBH GREENACRES				1	14			1	16
			WPBH LAKE WORTH				1	9		1	1	12
		LAKE WORTH Total					2	23		1	2	28
		LAUDERDALE LAKES	FTLD OAKLAND					17		1	1	19
		LAUDERDALE LAKES Total						17		1	1	19
		MIAMI	MIAM ALLAPATTAH					6		1		7
			MIAM BAYSHORE					11				11
			MIAM BISCAYNE				1	3			1	5
			MIAM CANAL					17				17
			MIAM DADELAND BLVD					1				1
			MIAM FLAGLER				1	8		1	1	11
			MIAM GRANDE					27		2		29
			MIAM METRO					2			1	3
			MIAM MIAMI SHORES	1			1	8		1	1	12
			MIAM NORTHSIDE				1	7			1	9
			MIAM PALMETTO					10		2		12
			MIAM RED ROAD					16				16
			MIAM SILVER OAKS					15		1		16
			MIAM W. DADE					9			1	10
			NDAD BRENTWOOD	1				8			1	10
			NDAD GOLDEN GLADES					9				9
			NDAD OLETA					11				11
			PERRINE MAIN					15				15
		MIAMI Total		2			4	183		8	7	204
		MIAMI BEACH	MIAM BEACH					11				11
			MIAM INDIAN CREEK					7				7
		MIAMI BEACH Total						18				18
		MIAMI SPRINGS	MIAM AIRPORT		1		1	2			1	5
			MIAM POINCIANA					15				15
		MIAMI SPRINGS Total			1		1	17			1	20
		NORTH MIAMI	MIAM NORTH MIAMI				1	8		1	1	11
		NORTH MIAMI Total					1	8		1	1	11
		NORTH MIAMI BEACH	NDAD ARCH CREEK					9		1	1	11
		NORTH MIAMI BEACH Total						9		1	1	11
		OPA LOCKA	MIAM OPA LOCKA				1	7				8
		OPA LOCKA Total					1	7				8
		PALM BEACH GARDENS	WPBH GARDENS	1				11		1	1	14
		PALM BEACH GARDENS Total		1				11		1	1	14

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		PEMBROKE PINES	HLWD PEMBROKE PINES					18				18
		PEMBROKE PINES Total						18				18
		PLANTATION	FTLD JACARANDA					17				17
			FTLD PLANTATION					20			1	21
		PLANTATION Total						37			1	38
		POMPANO BEACH	PMBH FEDERAL					17			1	18
		POMPANO BEACH Total						17			1	18
		RIVIERA BEACH	WPBH RIVIERA BEACH				1	12			1	14
		RIVIERA BEACH Total					1	12			1	14
		ROYAL PALM BEACH	WPBH ROYAL PALM BCH				1	8		1	1	11
		ROYAL PALM BEACH Total					1	8		1	1	11
		SUNRISE	FTLD SAWGRASS					1				1
			FTLD SUNRISE					9		1		10
		SUNRISE Total						10		1		11
		TAMARAC	PMBH TAMARAC					8		1		9
		TAMARAC Total						8		1		9
		WEST MIAMI	MIAM W. MIAMI	1				16			1	18
		WEST MIAMI Total		1				16			1	18
		WEST PALM BEACH	WPBH HAVERHILL					17			1	18
			WPBH MAIN ANNEX					18				18
		WEST PALM BEACH Total						35			1	36
	PMFLSOUTH Total			4	1	1	15	710		24	33	788
	SC	AIKEN	AIKEN MA					2		1		3
		AIKEN Total						2		1		3
		ANDERSON	ANDERSON MAIN					9				9
		ANDERSON Total						9				9
		CAMDEN	CAMDEN MA					1				1
		CAMDEN Total						1				1
		CAYCE	CLMA SWIFT					12		1		13
		CAYCE Total						12		1		13
		CHARLESTON	CHTN DIAL & TOLL					12		1		13
			CHTN WEST ASHLEY					10				10
		CHARLESTON Total						22		1		23
		CHARLESTON HEIGHTS	CHTN DEER PARK					9				9
		CHARLESTON HEIGHTS Total						9				9
		COLUMBIA	CLMA ARDEN		1			10				11
			CLMA BECKMAN ROAD					1				1
			CLMA CAMDEN HWY					12				12
			CLMA PARKLANE					1				1
			CLMA SENATE ST					18				18
			CLMA ST ANDREWS					12		2		14

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
			CLMA SUMTER HWY					5				5
		COLUMBIA Total			1			59		2		62
		EASLEY	EASLEY MAIN					5				5
		EASLEY Total						5				5
		FLORENCE	FLORENCE MAIN					3				3
		FLORENCE Total						3				3
		FOREST ACRES	CLMA SUNSET					9				9
		FOREST ACRES Total						9				9
		GAFFNEY	GAFFNEY MAIN					2				2
		GAFFNEY Total						2				2
		GREENVILLE	GNVL BEREA					3				3
			GNVL CRESTWOOD					5				5
			GNVL WEST					6				6
			GNVL WOODRUFF RD					12				12
			GREENVILLE D&T					15				15
		GREENVILLE Total						41				41
		GREER	GREER MAIN					9				9
		GREER Total						9				9
		IRMO	CLMA DUTCH FORK					9				9
		IRMO Total						9				9
		JAMES ISLAND	CHTN JAMES ISLAND					4				4
		JAMES ISLAND Total						4				4
		LYMAN	LYMAN MAIN					1				1
		LYMAN Total						1				1
		MT PLEASANT	MOUNT PLEASANT MA					9				9
		MT PLEASANT Total						9				9
		NORTH AUGUSTA	NORTH AUGUSTA MA					2				2
		NORTH AUGUSTA Total						2				2
		NORTH CHARLESTON	CHTN LAMBS					7				7
			CHTN NORTH					11				11
		NORTH CHARLESTON Total						18				18
		ORANGEBURG	ORANGEBURG MA					2				2
		ORANGEBURG Total						2				2
		SENECA	SENECA MAIN					1				1
		SENECA Total						1				1
		SPARTANBURG	SPBG MAIN					12				12
			SPBG UNIVERSITY WAY					1				1
			SPBG WESTVIEW					7				7
		SPARTANBURG Total						20				20
		SUMMERVILLE	SUMMERVILLE MA					7		1		8
		SUMMERVILLE Total						7		1		8

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		TAYLORS	GNVL CHURCHILL					9				9
		TAYLORS Total						9				9
		YORK	YORK MAIN					1				1
		YORK Total						1				1
	SC Total				1			266		6		273
	TN	ALCOA	MARYVILLE					4		3		7
		ALCOA Total						4		3		7
		ANTIOCH	NSVL-HICKORY HOLLOW					1				1
		ANTIOCH Total						1				1
		ATHENS	ATHENS							1		1
		ATHENS Total								1		1
		BRENTWOOD	NSVL-BRENTWOOD					12		2		14
		BRENTWOOD Total						12		2		14
		CHATTANOOGA	CHTG-BRAINERD					11		1		12
			CHTG-DODDS					8		2		10
			CHTG-NINTH ST.					11		2		13
			CHTG-RED BANK					4		1		5
			CHTG-ST. ELMO					1				1
		CHATTANOOGA Total						35		6		41
		CLARKSVILLE	CLARKSVILLE					5				5
		CLARKSVILLE Total						5				5
		CLEVELAND	CLEVELAND					3				3
		CLEVELAND Total						3				3
		COLLIERVILLE	COLLIERVILLE					9		1	2	12
		COLLIERVILLE Total						9		1	2	12
		COLUMBIA	COLUMBIA					1		1		2
		COLUMBIA Total						1		1		2
		FRANKLIN	FRANKLIN					11		1		12
		FRANKLIN Total						11		1		12
		GALLATIN	GALLATIN					5				5
		GALLATIN Total						5				5
		GERMANTOWN	MMPH-GERMANTOWN					9		4	1	14
		GERMANTOWN Total						9		4	1	14
		GOODLETTSVILLE	GOODLETTSVILLE					6		2		8
		GOODLETTSVILLE Total						6		2		8
		HENDERSONVILLE	HENDERSONVILLE					8		1	1	10
		HENDERSONVILLE Total						8		1	1	10
		HIXSON	CHTG-MIDD.VALLEY					2				2
		HIXSON Total						2				2
		JACKSON	JACKSON MAIN		1			3				4
			JACKSON NRTHSIDE					1		2		3

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		JACKSON Total			1			4		2		7
		KNOXVILLE	KNVL-BEARDEN					8		1		9
			KNVL-FOUNTAIN CY					5		1		6
			KNVL-MAIN					12		2		14
			KNVL-WEST HILLS					8		1		9
			KNVL-YOUNG HIGH					5		1		6
		KNOXVILLE Total						38		6		44
		LEBANON	LEBANON					4			1	5
		LEBANON Total						4			1	5
		MADISON	NSVL-MADISON					9		1		10
		MADISON Total						9		1		10
		MEMPHIS	MMPH-BARTLETT					9		4	1	14
			MMPH-CHEROKEE					3		1		4
			MMPH-CHICKASAW					8		4	1	13
			MMPH-EASTLAND					8		3		11
			MMPH-FRAYSER					1				1
			MMPH-HUMPHREYS					1			1	2
			MMPH-MAIN		1			13		4	1	19
			MMPH-MIDTOWN					8		3	1	12
			MMPH-OAKVILLE					8		5	1	14
			MMPH-SOUTHLAND					8		4	1	13
			MMPH-SOUTHSIDE					5		2	1	8
			MMPH-SOUTHWIND					2				2
			MMPH-WESTWOOD					1				1
		MEMPHIS Total			1			75		30	8	114
		MORRISTOWN	MORRISTOWN					2				2
		MORRISTOWN Total						2				2
		MURFREESBORO	MURFREESBORO					11		2		13
		MURFREESBORO Total						11		2		13
		NASHVILLE	NSVL-AIRPORT					7		2	1	10
			NSVL-BELLEVUE					4			2	6
			NSVL-BURTON HILLS					1				1
			NSVL-COCKRILL BD					1				1
			NSVL-CRIEVE HALL					13		1	1	15
			NSVL-DONELSON					16		1	1	18
			NSVL-INGLEWOOD					6		2	1	9
			NSVL-MAIN					19		3	1	23
			NSVL-SHARONDALE					14		2	1	17
			NSVL-UNIVERSITY					13		2	1	16
			NSVL-WEST MEADE					7		1	1	9
		NASHVILLE Total						101		14	10	125

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		OAK RIDGE	OAK RIDGE					4		2		6
		OAK RIDGE Total						4		2		6
		ROSSVILLE	CHTG-ROSSVILLE					2		1		3
		ROSSVILLE Total						2		1		3
		SEVIERVILLE	SEVIERVILLE					2		2		4
		SEVIERVILLE Total						2		2		4
		SMYRNA	SMYRNA					6				6
		SMYRNA Total						6				6
		TULLAHOMA	TULLAHOMA					1		1		2
		TULLAHOMA Total						1		1		2
	TN Total				2			370		83	23	478
PHYSICAL Total				7	15	1	45	3602		323	151	4144
VIRTUAL	AL	BIRMINGHAM	BHAM-MAIN & TOLL						3			3
		BIRMINGHAM Total							3			3
		HOOVER	BHAM-RIVERCHASE						1			1
		HOOVER Total							1			1
		HUNTSVILLE	HUNTS-M&T						2			2
			HUNTS-PARKWAY						1			1
			HUNTS-UNIVERSITY						2			2
			MADISON						1			1
		HUNTSVILLE Total							6			6
		MOBILE	MOBL-AZALEA						2			2
			MOBL-OLD SHELL						1			1
		MOBILE Total							3			3
		MONTGOMERY	MONT-DALRAIDA						1			1
			MONT-M&T						1			1
		MONTGOMERY Total							2			2
	AL Total								15			15
	GA	ACWORTH	ACWORTH MAIN						3			3
		ACWORTH Total							3			3
		ALBANY	ALBANY MAIN						1	1		2
		ALBANY Total							1	1		2
		ALPHARETTA	ALPHARETTA MAIN		2				8			10
		ALPHARETTA Total			2				8			10
		ATHENS	ATHENS MAIN						1			1
		ATHENS Total							1			1
		ATLANTA	BUCKHEAD		1				13			14
			COURTLAND STREET						5			5
			PEACHTREE PLACE						5			5
			SANDY SPRINGS						7			7
			TOCO HILLS						2			2

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
			WEST END							1		1
			WOODLAND						3			3
		ATLANTA Total			1				35	1		37
		AUGUSTA	AUGUSTA FLEMING						1			1
			AUGUSTA MAIN						1			1
			AUGUSTA THE HILL						1			1
		AUGUSTA Total							3			3
		BUFORD	BUFORD ESS						1			1
		BUFORD Total							1			1
		CLARKSTON	INDIAN CREEK						4			4
		CLARKSTON Total							4			4
		COLLEGE PARK	RIVERDALE						2			2
		COLLEGE PARK Total							2			2
		COLUMBUS	COLUMBUS MAIN						1			1
		COLUMBUS Total							1			1
		DULUTH	DULUTH ESS						1			1
		DULUTH Total							1			1
		DUNWOODY	DUNWOODY						2			2
		DUNWOODY Total							2			2
		EAST POINT	EAST POINT						1			1
		EAST POINT Total							1			1
		FAYETTEVILLE	FAYETTEVILLE ESS						1			1
		FAYETTEVILLE Total							1			1
		GARDEN CITY	SAV.GARDEN CITY						1			1
		GARDEN CITY Total							1			1
		LAWRENCEVILLE	LAWRENCEVILLE						1			1
		LAWRENCEVILLE Total							1			1
		LILBURN	LILBURN						3			3
		LILBURN Total							3			3
		LITHONIA	LITHONIA ESS						1			1
		LITHONIA Total							1			1
		MACON	MACON MAIN						1			1
		MACON Total							1			1
		MARIETTA	MARIETTA MAIN		1				2			3
			POWERS FERRY		3				11			14
		MARIETTA Total			4				13			17
		NORCROSS	NORCROSS		2				7			9
		NORCROSS Total			2				7			9
		PEACHTREE CITY	PEACHTREE CITY						1			1
		PEACHTREE CITY Total							1			1
		POWDER SPRINGS	POWDER SPRINGS ESS						1			1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		POWDER SPRINGS Total							1			1
		ROSWELL	ROSWELL MAIN						4			4
		ROSWELL Total							4			4
		SAVANNAH	SAV.BULL STREET						2			2
			SAV.DERENNE						1			1
		SAVANNAH Total							3			3
		SMYRNA	SMYRNA						1			1
		SMYRNA Total							1			1
		STOCKBRIDGE	STOCKBRIDGE ESS						1			1
		STOCKBRIDGE Total							1			1
		VALDOSTA	VALDOSTA MAIN						1			1
		VALDOSTA Total							1			1
	GA Total				9				103	2		114
	KY	LOUISVILLE	LOU-ARMORY PLACE						1	1		2
			LOU-BARDSTOWN RD		1							1
			LOU-BEECHMONT		1							1
		LOUISVILLE Total			2				1	1		4
	KY Total				2				1	1		4
	LA	BATON ROUGE	BT.RG.-GOODWOOD						2	2		4
			BT.RG.-ISTROUMA							2		2
			BT.RG.-MAIN						2	2		4
			BT.RG.-OAK HILLS						1	1		2
			BT.RG.-SUBURBAN							2		2
			BT.RG.-WOODLAWN							1		1
		BATON ROUGE Total							5	10		15
		BOSSIER CITY	SHPT-BOSSIER							1		1
		BOSSIER CITY Total								1		1
		LAFAYETTE	LAF-MAIN						1			1
		LAFAYETTE Total							1			1
		MONROE	MONR-MAIN						1			1
		MONROE Total							1			1
		NEW ORLEANS	N.O.-MAIN						3			3
		NEW ORLEANS Total							3			3
		SHREVEPORT	SHPT-MAIN						2			2
			SHPT-QUEENSBORO						1			1
			SHPT-SO.HIGHLDS							1		1
			SHPT-SUM GROVE						1			1
		SHREVEPORT Total							4	1		5
	LA Total								14	12		26
	MS	HATTIESBURG	HATTIESBURG MAIN						1			1
		HATTIESBURG Total							1			1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		JACKSON	JCS CAP PEARL						2	1		3
			JCS RIDGEWOOD						1			1
		JACKSON Total							3	1		4
		PEARL	JCS PEARL CITY						1			1
		PEARL Total							1			1
		TUPELO	TUPL MAIN							1		1
		TUPELO Total								1		1
		VICKSBURG	VICKSBURG						1			1
		VICKSBURG Total							1			1
	MS Total								6	2		8
	NC	ASHEVILLE	AHVL-O HENRY						1			1
		ASHEVILLE Total							1			1
		BURLINGTON	BURLINGTON-DAVIS						2			2
		BURLINGTON Total							2			2
		CARY	CARY-CENTRAL						4			4
			CARY-WESTON						1			1
		CARY Total							5			5
		CHAPEL HILL	CHAPEL HILL-ROSEMARY						3			3
		CHAPEL HILL Total							3			3
		CHARLOTTE	CHARLOTTE-CALDWELL						5			5
			CHARLOTTE-CARMEL						2			2
			CHARLOTTE-DERITA						2			2
			CHARLOTTE-ERWIN RD						1			1
			CHARLOTTE-LAKE POINT						1			1
			CHARLOTTE-REID						4			4
			CHARLOTTE-S BLVD						6			6
			CHARLOTTE-UNIVERSITY						3			3
			CHRL-CENTRAL AVE.						2	1		3
			CHRL-SHARON AMITY						4			4
			CHRL-THOMASBORO						2			2
		CHARLOTTE Total							32	1		33
		GARNER	RLGH-GARNER						1			1
		GARNER Total							1			1
		GASTONIA	GASTONIA-SOUTH ST						1			1
		GASTONIA Total							1			1
		GREENSBORO	GNBO-AIRPORT						2			2
			GNBO-ASHLAND DR.						3			3
			GNBO-EUGENE						2			2
			GNBO-LAWNDALE						1			1
			GNBO-MCKNIGHT MILL						1			1
		GREENSBORO Total							9			9

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		RALEIGH	RLGH-GLENWOOD						2			2
			RLGH-JONES FRANKLIN						1			1
			RLGH-MORGAN						3			3
			RLGH-NEW HOPE						4			4
			RLGH-SIX FORKS						2			2
		RALEIGH Total							12			12
		WILMINGTON	WLMG-FOURTH ST.						1			1
			WLMG-WINTER PARK						1			1
		WILMINGTON Total							2			2
		WINSTON-SALEM	WNSL-FIFTH ST.						4			4
			WNSL-GLENN AVE.						1			1
			WNSL-LEXINGTON						1	1		2
			WNSL-VINEYARD						1	1		2
		WINSTON-SALEM Total							7	2		9
	NC Total								75	3		78
	PMFLNOR	COCOA	COCOA-MAIN				1		1			2
		COCOA Total					1		1			2
		DAYTONA BEACH	DYBH-MAIN				1		3			4
		DAYTONA BEACH Total					1		3			4
		GAINESVILLE	GSVL-MAIN						3			3
			GSVL-NORTHWEST						1			1
		GAINESVILLE Total							4			4
		HEATHROW	LAKE MARY - HEATHROW						1			1
		HEATHROW Total							1			1
		JACKSONVILLE	JCVL-ARLINGTON						3			3
			JCVL-BEACHWOOD						4			4
			JCVL-CLAY STREET MGO						7			7
			JCVL-FORT CAROLINE						1			1
			JCVL-NORMANDY						2			2
			JCVL-RIVERSIDE						3			3
			JCVL-SAN JOSE						4			4
			JCVL-SAN MARCO						4			4
			JCVL-SOUTHPOINT						3			3
			JCVL-WESCONNETT						1			1
			MNDR-AVENUES						2			2
		JACKSONVILLE Total							34			34
		JACKSONVILLE BEACH	JCBH-MAIN						1			1
		JACKSONVILLE BEACH Total							1			1
		MANDARIN	MNDR-LORETTO						2			2
		MANDARIN Total							2			2
		MELBOURNE	EGLL-BOWE GARDENS						1			1

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
			MELBOURNE				1		2			3
		MELBOURNE Total					1		3			4
		MERRITT ISLAND	COCOA-MERRITT ISLAND						1			1
		MERRITT ISLAND Total							1			1
		ORLANDO	ORLD-AZALEA PARK						2			2
			ORLD-COLONIAL						2			2
			ORLD-MAGNOLIA						8			8
			ORLD-PINECASTLE						3			3
			ORLD-PINEHILLS						3			3
			ORLD-SAND LAKE						3			3
		ORLANDO Total							21			21
		ORMOND BEACH	DYBH-ORMOND BEACH						1			1
		ORMOND BEACH Total							1			1
		PENSACOLA	PNSC-BELMONT						4			4
			PNSC-FERRY PASS						1			1
			PNSC-WARRINGTON						1			1
		PENSACOLA Total							6			6
		PORT ORANGE	DYBH-PORT ORANGE						1			1
		PORT ORANGE Total							1			1
		SAINT AUGUSTINE	STAG-MAIN				1					1
		SAINT AUGUSTINE Total					1					1
		SANFORD	SANFORD-O-WS						1			1
		SANFORD Total							1			1
		VERO BEACH	VERO BEACH MAIN				1					1
		VERO BEACH Total					1					1
	PMFLNORTH Total						5		80			85
	PMFLSOU	BOCA RATON	BCRT BOCA TEECA						2			2
			BCRT SANDALFOOT				1					1
			BOCA RATON MAIN				1		1			2
		BOCA RATON Total					2		3			5
		COCONUT CREEK	PMBH MARGATE						1			1
		COCONUT CREEK Total							1			1
		CORAL GABLES	MIAM ALHAMBRA				2					2
		CORAL GABLES Total					2					2
		DEERFIELD BEACH	DEERFIELD BEACH MAIN				1		1			2
		DEERFIELD BEACH Total					1		1			2
		FORT LAUDERDALE	FT LAUD MAIN RELIEF				2					2
			FTLD CORAL RIDGE				1		1			2
			FTLD CYPRESS				1		1			2
			FTLD WESTON				1					1
		FORT LAUDERDALE Total					5		2			7

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		HIALEAH	MIAM HIALEAH				2					2
		HIALEAH Total					2					2
		HOLLYWOOD	HLWD WEST HOLLYWOOD				1		1	1		3
			HOLLYWOOD MAIN				2		2			4
		HOLLYWOOD Total					3		3	1		7
		HOMESTEAD	HOMESTEAD MAIN				1					1
		HOMESTEAD Total					1					1
		KEY WEST	KEY WEST MAIN				1					1
		KEY WEST Total					1					1
		LAUDERDALE LAKES	FTLD OAKLAND				1		1			2
		LAUDERDALE LAKES Total					1		1			2
		MIAMI	MIAM BAYSHORE						1			1
			MIAM BISCAYNE				1					1
			MIAM CANAL				1					1
			MIAM GRANDE				2		3			5
			MIAM METRO				1		1			2
			MIAM PALMETTO				2		4	3		9
			MIAM RED ROAD				2					2
			MIAM SILVER OAKS				1					1
			NDAD BRENTWOOD				1					1
			NDAD GOLDEN GLADES				1		3	1		5
			NDAD OLETA				1					1
			PERRINE MAIN				1					1
		MIAMI Total					14		12	4		30
		MIAMI BEACH	MIAM BEACH				1					1
		MIAMI BEACH Total					1					1
		MIAMI SPRINGS	MIAM POINCIANA				1					1
		MIAMI SPRINGS Total					1					1
		NORTH MIAMI	MIAM NORTH MIAMI				1					1
		NORTH MIAMI Total					1					1
		NORTH MIAMI BEACH	NDAD ARCH CREEK				1					1
		NORTH MIAMI BEACH Total					1					1
		PALM BEACH GARDENS	WPBH GARDENS				1			3		4
		PALM BEACH GARDENS Total					1			3		4
		PEMBROKE PINES	HLWD PEMBROKE PINES				1		1	1		3
		PEMBROKE PINES Total					1		1	1		3
		PLANTATION	FTLD JACARANDA				1					1
			FTLD PLANTATION				1					1
		PLANTATION Total					2					2
		POMPANO BEACH	PMBH FEDERAL				1		1			2
		POMPANO BEACH Total					1		1			2

Count of RefNum				Status								
Application	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		SUNRISE	FTLD SUNRISE				1					1
		SUNRISE Total					1					1
		WEST MIAMI	MIAM W. MIAMI				1					1
		WEST MIAMI Total					1					1
		WEST PALM BEACH	WPBH HAVERHILL						1			1
			WPBH MAIN ANNEX				1					1
		WEST PALM BEACH Total					1		1			2
	PMFLSOUTH Total						44		26	9		79
	SC	ANDERSON	ANDERSON MAIN						1			1
		ANDERSON Total							1			1
		CHARLESTON	CHTN DIAL & TOLL						1			1
		CHARLESTON Total							1			1
		COLUMBIA	CLMA ARDEN						1			1
			CLMA SENATE ST						3			3
			CLMA ST ANDREWS						1			1
		COLUMBIA Total							5			5
		GREENVILLE	GNVL WOODRUFF RD						1			1
			GREENVILLE D&T						2			2
		GREENVILLE Total							3			3
		SPARTANBURG	SPBG MAIN						1	1		2
			SPBG WESTVIEW						1			1
		SPARTANBURG Total							2	1		3
	SC Total								12	1		13
	TN	BRENTWOOD	NSVL-BRENTWOOD		1				1			2
		BRENTWOOD Total			1				1			2
		CHATTANOOGA	CHTG-BRAINERD							1		1
			CHTG-DODDS							1		1
			CHTG-NINTH ST.							1		1
		CHATTANOOGA Total								3		3
		FRANKLIN	FKLN-COOL SPRINGS						1			1
			FRANKLIN						1			1
		FRANKLIN Total							2			2
		GALLATIN	GALLATIN						1			1
		GALLATIN Total							1			1
		HENDERSONVILLE	HENDERSONVILLE						1			1
		HENDERSONVILLE Total							1			1
		LEBANON	LEBANON						1			1
		LEBANON Total							1			1
		NASHVILLE	NSVL-DONELSON						1			1
		NASHVILLE Total							1			1
		SMYRNA	SMYRNA						1			1

Count of RefNum			Status								
Application T	Area Code	WC City	WC Name	EA	FB	FM	RC	SA	SC	SR	TM	Grand Total
		SMYRNA Total							1			1
	TN Total				1				8	3		12
VIRTUAL Total					12		49		340	33		434
BellSouth Grand Total				7	27	1	94	3602	340	357	151	4579

WKM-2

Exhibit No. WKM – 2

POLES, DUCTS AND CONDUITS

I. PURPOSE OF EXHIBIT

1. The purpose of this exhibit is to demonstrate that BellSouth offers nondiscriminatory access to poles, ducts, conduits and rights-of-way to competing providers of telecommunications services in compliance with sections 251(b)(4), 224, and 271(c)(2)(B)(iii) of the Telecommunications Act ("Act").

2. This exhibit describes the region-wide process used by BellSouth to provide CLECs access to poles, ducts, conduits, (also hereinafter "structures") and rights-of-way; compares it to the process that BellSouth uses to provision the same facilities and services to itself or any affiliate; and discusses the implementation of the process in Tennessee. Although the processes are not always identical, as explained below, the procedure available to CLECs is nondiscriminatory and offers competitors a meaningful opportunity to compete. The Federal Communications Commission ("Commission") deemed these very same procedures nondiscriminatory when reviewing BellSouth's application for in-region, interLATA authority in Louisiana. See Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, 13 FCC Rcd 20599, 20706-12, ¶¶ 171-183 (1998) ("Second Louisiana Order"). This finding is consistent with the recent Georgia Public Service Commission ("GPSC") decision in Docket 6863-U, dated September 27, 2001 (page 1) (App. L – GA, Tab 5), the Order of the Louisiana Public

Service Commission ("LPSC") in Docket No. U-22252-E, dated September 21, 2001 (page 5) (App. C – LA, Tab 23) and the orders of the South Carolina Public Service Commission ("SCPSC") in Docket No. 2001-209-C, and the Mississippi Public Service Commission ("MPSC") in Docket No. 97-AD-321 that likewise found that BellSouth has met the requirements of Checklist Item 3. The provision of access remains to this day consistent with the affirmative conclusions reached by the Commissions, the GPSC, LPSC, SCPSC, and MPSC.

II. PROCESS EXPLANATION

3. BellSouth established a Competitive Structures Provisioning Center ("CSPC") in Birmingham, Alabama for processing all CLEC requests for access to BellSouth's poles, ducts, conduits and rights-of-way to ensure that competitors requesting such access receive prompt, consistent, and nondiscriminatory treatment.

4. To gain access to poles, ducts, conduits, and rights-of-way, a CLEC must execute a license agreement with BellSouth. The purpose of the License Agreement is to set out the terms and conditions applicable to all specific licenses granted to the CLEC upon BellSouth approval of a CLEC application. BellSouth offers a standard license agreement (together with operational guidelines and application forms) to CLECs seeking access to poles, ducts, conduit, and rights-of-way. A CLEC either can adopt the standard license agreement or negotiate a non-standard agreement with BellSouth. In either case, the license agreement sets out the terms and conditions applicable to all licenses granted the CLEC by BellSouth. CLECs may execute agreements on a statewide or region-wide basis.

5. At the time BellSouth provides the CLEC with the final agreement for its signature, BellSouth also provides operational guidelines to assist the CLEC in completing the necessary application forms related to specific poles, ducts, and conduits. Upon request, BellSouth personnel also are available to help CLECs with the application forms.

6. After execution of a license agreement, a CLEC may submit an application to attach to or occupy specific structures or rights-of-way owned or controlled by BellSouth. The application process permits the CLEC to convey its structure requirements to BellSouth. This allows BellSouth, in turn, to respond with timely and accurate information to enable the CLEC to evaluate and schedule its plans of operation. BellSouth evaluates all CLEC requests according to widely accepted standards regarding capacity, safety, reliability, and general engineering. BellSouth evaluates its own access needs according to the same standards.

7. CLECs must specify in writing the geographic location, type and quantity of structures, and the in-service date required. This process involves completing and submitting the appropriate application forms through the CSPC single point of contact. BellSouth processes all applications on a first-come, first-served basis without regard to applicant, and, as described below, on a nondiscriminatory basis as compared to BellSouth itself. See Second Louisiana Order ¶ 177

8. When an application is approved, BellSouth grants a license to the CLEC to attach to or occupy BellSouth's requested poles, ducts, conduits or rights-of-way. Multiple licenses may be

granted under a single CLEC license agreement; however, separate license applications must be submitted for each set of poles, ducts, conduits or rights-of-way to which access is desired.

9. BellSouth may deny an application due to insufficient capacity, or for reasons of safety, reliability or other generally applicable engineering concerns. See 47 C.F.R. § 1.1403(b); Second Louisiana Order ¶¶ 176-177. If an application is denied for one of these reasons, BellSouth will provide the requesting carrier a written explanation of BellSouth's decision. See id. BellSouth takes all reasonable steps to accommodate the request for access prior to denying a request. See Local Competition Order ¶¶ 1162-1163; Second Louisiana Order n.586. BellSouth will, for instance, remove retired cable from conduit if the requesting CLEC agrees to pay the cost, as required by the Act. On poles, BellSouth will do rearrangements and/or pole changeouts, again if the CLEC pays the expenses of all parties involved.

III. ACCESS TO INFORMATION

10. The CLECs may obtain access to geographic-specific engineering information regarding poles, ducts, and conduits either by requesting that BellSouth provide the information to them or by seeking access to BellSouth's records. See Second Louisiana Order ¶ 180. In order to protect the confidential, proprietary information of BellSouth and other users, procedures have been established for providing record information that designates facilities of existing companies, without identifying those companies. If the CLEC requests to view BellSouth's records, BellSouth will make paper copies available at a Records Maintenance Center within five (5) business days. These copies may be taken by the CLEC. If the CLEC instead chooses to receive these records through the mail, BellSouth has committed to accomplish this within

twenty (20) business days, including time required for handling and mailing. This twenty (20)-day period reflects the amount of time required for BellSouth to reasonably produce, redact, and deliver the record information to the CLEC's designated location. On larger-than-normal requests, BellSouth routinely works with CLECs to establish a priority for the production and delivery of records on a negotiated schedule. No party, in Georgia or Louisiana or any other state within the BellSouth region, has asserted that BellSouth's time for responding to requests for delivery of records is unreasonable. Upon receipt of the record copies, the CLEC can begin its planning phase based upon available information.

11. BellSouth maintains an inventory mapping system that records the location and physical attributes of its pole, duct, and conduit structures and associated facilities. CLECs can subscribe to the entire mapping system utilized by BellSouth (with proprietary information removed), but they are responsible for covering the costs of removing proprietary information and producing a redacted copy. Because CLECs are primarily interested in specific geographic areas, the costs of duplicating the entire system may not be considered a reasonable business expense. Indeed, no CLEC has expressed an interest in duplicating BellSouth's complete records system.

12. A field inspection is conducted in response to the application. This entails a physical inspection of existing structures to determine availability. If spare capacity is not available and an application must be denied, BellSouth will so advise the CLEC within forty-five (45) days from the receipt of the request. If a records investigation indicates the availability of structures, a physical (field) inspection may be required to determine the usability of the structures. This would only normally apply to ducts and conduits in situations where no BellSouth person or

agent, after the records review, has actual knowledge of the physical availability of the structure. In addition to determining the availability of requested structures, BellSouth also performs an investigation of the work it would have to perform relative to making structures available to the CLEC (e.g., physically relocating cables on pole lines and or rodding ducts, etc.). BellSouth will provide the CLEC at least forty-eight (48) hours notice prior to initiating a field survey, if the CLEC has indicated a desire to be present for that survey. Alternatively, BellSouth permits the CLEC to perform the field investigation itself. The time required for BellSouth to determine the extent of make-ready work needed and, therefore, to process the CLEC application, varies based upon the magnitude of the request.

IV. PROVISIONING

13. Upon completing the investigation, BellSouth informs the CLEC of any costs that would be required to make BellSouth's facilities ready to accommodate its request ("make-ready" costs) and the date by which BellSouth could complete the required work. See Second Louisiana Order ¶ 177. If BellSouth determines that no make-ready work is required, BellSouth will approve the CLEC's request for pole attachment and/or conduit occupancy licenses and issue a license for use of poles, ducts, conduit, or rights-of-way within twenty (20) business days after the determination has been made that no make-ready work is required, but in no event later than forty-five (45) days after BellSouth receives the CLEC's application, which period shall exclude any time BellSouth is awaiting a response from the CLEC.

14. If make-ready work were required, BellSouth employees, or independent contractors acting on behalf of BellSouth, would then issue a work authorization to complete the CLEC's required

work. The time that it takes to complete the work is dictated by the complexity, degree of detail, and size (number of poles, feet of conduit, route miles, etc.) of each request.

15. If BellSouth requires additions to its own facilities, these proposed additions are handled internally using the same criteria and processes that are used for evaluating a CLEC request. BellSouth does not reserve space for its own future business needs or give itself a preference when assigning space. BellSouth does not and will not favor itself, as a matter of policy, procedure or fact, over other carriers when provisioning access to poles, ducts, conduits and rights-of-way. See Second Louisiana Order ¶ 178. BellSouth employees, or independent contractors acting on behalf of BellSouth, are responsible for the scheduled planning, engineering, and overall management of BellSouth's structures. This same workforce evaluates all requests for access to these structures using the same criteria regardless of whether the request was made by a CLEC or by BellSouth. See id.

16. Work requests receive identical treatment regardless of their source. In every case, a work authorization is created and the work is scheduled for completion, in a nondiscriminatory manner, within BellSouth's normal workload.

17. BellSouth utilizes a mechanized scheduling system for this purpose. To assure nondiscriminatory treatment, the identity of the party requesting work is kept anonymous when authorization details are entered into the system. The work authorizations are evaluated and scheduled based upon specific job-related details such as job type, job size, and due date. Scheduling is the same regardless of whether the requesting party is a CLEC or BellSouth.

18. The CLEC pays for all make-ready work undertaken by BellSouth to prepare BellSouth's conduit system, poles, or anchors and related facilities for the requested occupancy or attachment. Make-ready work includes clearing obstructions and rearrangement, transfer, replacement, removal, repair, or modification of BellSouth's facilities. BellSouth does not charge the CLEC and bears the costs for any changes that are made to meet BellSouth's needs.

19. To the extent that parties other than BellSouth (such as power and CATV companies) are required to perform make-ready work because they have facilities on the poles or in the conduit, all parties must work together to ensure timely completion of all necessary work. The CLEC may contract with BellSouth or a BellSouth-certified contractor to perform certain make-ready work. See Second Louisiana Order ¶ 181; Local Competition Order ¶ 1182. However, in accordance with BellSouth's agreement with the Communications Workers of America ("CWA"), some types of work on poles must be performed by BellSouth pursuant to a joint use agreement whether the work is carried out for a CLEC's benefit or for BellSouth's benefit. Under this agreement, all make-ready work on BellSouth's aerial plant must be performed by BellSouth union employees represented by the CWA.

20. For conduit and underground work, the CLEC can contract with BellSouth or hire a BellSouth-approved contractor. The CLEC, at its option, may arrange for the performance of such work by a contractor not currently approved by BellSouth by submitting its choice of contractor for approval. Certification shall be granted based upon reasonable and customary criteria employed by BellSouth in the selection of its own contract labor. If the CLEC contracts with BellSouth to perform the make-ready work, BellSouth will follow its normal construction time

frame. A CLEC may request that make-ready work be expedited in accordance with the terms of its licensing agreement.

21. Charges for make-ready work performed by BellSouth are payable in advance.

22. After the required make-ready work is completed, BellSouth issues the CLEC a license for use of poles, ducts, conduit, or rights-of-way. Once the CLEC has its license for use, it may attach its cable ("facilities") to BellSouth's structures. The CLEC has one (1) year after issuance of the license to make its attachments or place its facilities in the specified ducts or conduits. If not used within this time, the space becomes available for others to use and the license is canceled.

23. Placement and maintenance of CLEC aerial and underground facilities are the responsibility of the CLEC. The CLEC can utilize a contractor that demonstrates compliance with BellSouth certification requirements -- the same requirements that BellSouth uses for certifying its own contractors. BellSouth does not and will not, as a matter of policy, procedure and fact, use its certification process to discriminate against any of its competitors. The CSPC maintains a list of approved contractors, which it makes available to interested CLECs upon request.

24. Under normal working conditions, BellSouth requires forty-eight (48) hours notice from CLECs seeking access to manholes to inspect facilities. In emergency situations, however, shorter notice will be accepted at no charge. The license agreement, consistent with Section 224 and the Commission's implementing rules (see 47 C.F.R. § 1.1403 (c)), provides that BellSouth and the CLEC will each give sixty (60) days advance written notice, if practicable, regarding modification, relocation, and replacement of facilities covered by the license agreement.

25. Annual rental fees for access to poles, ducts, conduit, and rights-of-way in Tennessee are set using the FCC's formula, and comport with BellSouth's obligations under Section 224, applicable state regulations, and its negotiated rates. BellSouth's rates are set out in the license agreement rate page.

26. Billing for annual rentals occurs on or about July 1 for six months in arrears (January through June) and six months in advance (July through December) for each calendar year. If a facility is not in use or occupied for the entire year, charges will be prorated for the portion of the year the facilities are in use or occupied. Attachment and/or occupancy licenses issued after current-year billing occurs will be billed in arrears the following year. Upon the cancellation of a license, the CLEC will be billed for space utilization from the period covered by the last bill through the date of removal of the CLEC's facilities. BellSouth charges for the actual costs incurred in evaluating requests prior to issuing the license (such as production and delivery of records, field investigation of structures, and make-ready work) at cost-based time and material charges. No rental fee is charged to the CLEC until a license to use the particular BellSouth structure has been issued. There is a one-month minimum charge. The monthly fee is prorated for the time between issuance of the license and the beginning of the first monthly billing period.

V. CONCLUSION

27. BellSouth currently has license agreements for access to poles, ducts, conduit, and rights-of-way (executed by the CSPC) with fifty-five (55) CLECs in the state of Tennessee.

28. Available data for the state of Tennessee as of March 6, 2002, indicates 17 of the total 55 Tennessee CLECs having executed license agreements with BellSouth have made 670 applications for Tennessee through the CSPC for access to BellSouth poles, ducts, conduit, and rights-of-way. There have been no denials of CLEC requests for access to BellSouth structures where BellSouth has existing facilities (either poles, ducts or conduit). In addition, in several locations, CLECs are currently in the process of building their own facilities or have completed placement of their own facilities.

Exhibit No. WKM – 3

LOOP CUTOVER PROCESS

Step 1: Technician gets call to begin cutover. Asks for cable pair information.

LOOP CUTOVER PROCESS

Step 2: Technician types in cable pair number to obtain order number.

LOOP CUTOVER PROCESS

Step 3: Technician retrieves copy of work order.

LOOP CUTOVER PROCESS

Step 4: Technician responds to UNE Center request to initiate overall cutover of service from BellSouth to CLEC.

LOOP CUTOVER PROCESS

Step 5: Technician conducts ANAC test to verify that correct loop is being cutover.

LOOP CUTOVER PROCESS

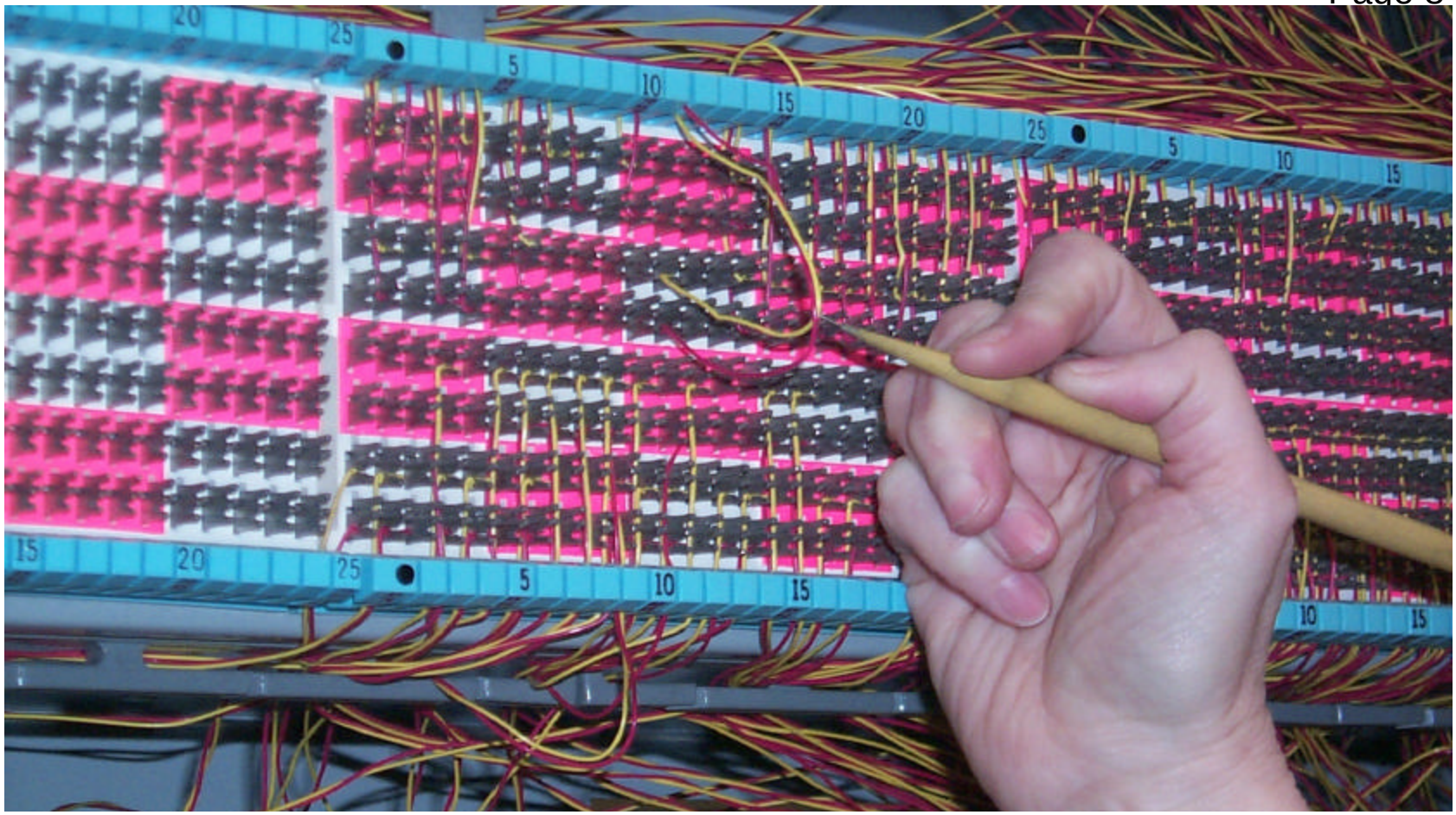
Step 6: Technician walks along Main Distributing Frame to locate both ends of jumper to be cut.

LOOP CUTOVER PROCESS

Step 7: Technician locates precise location of jumper.

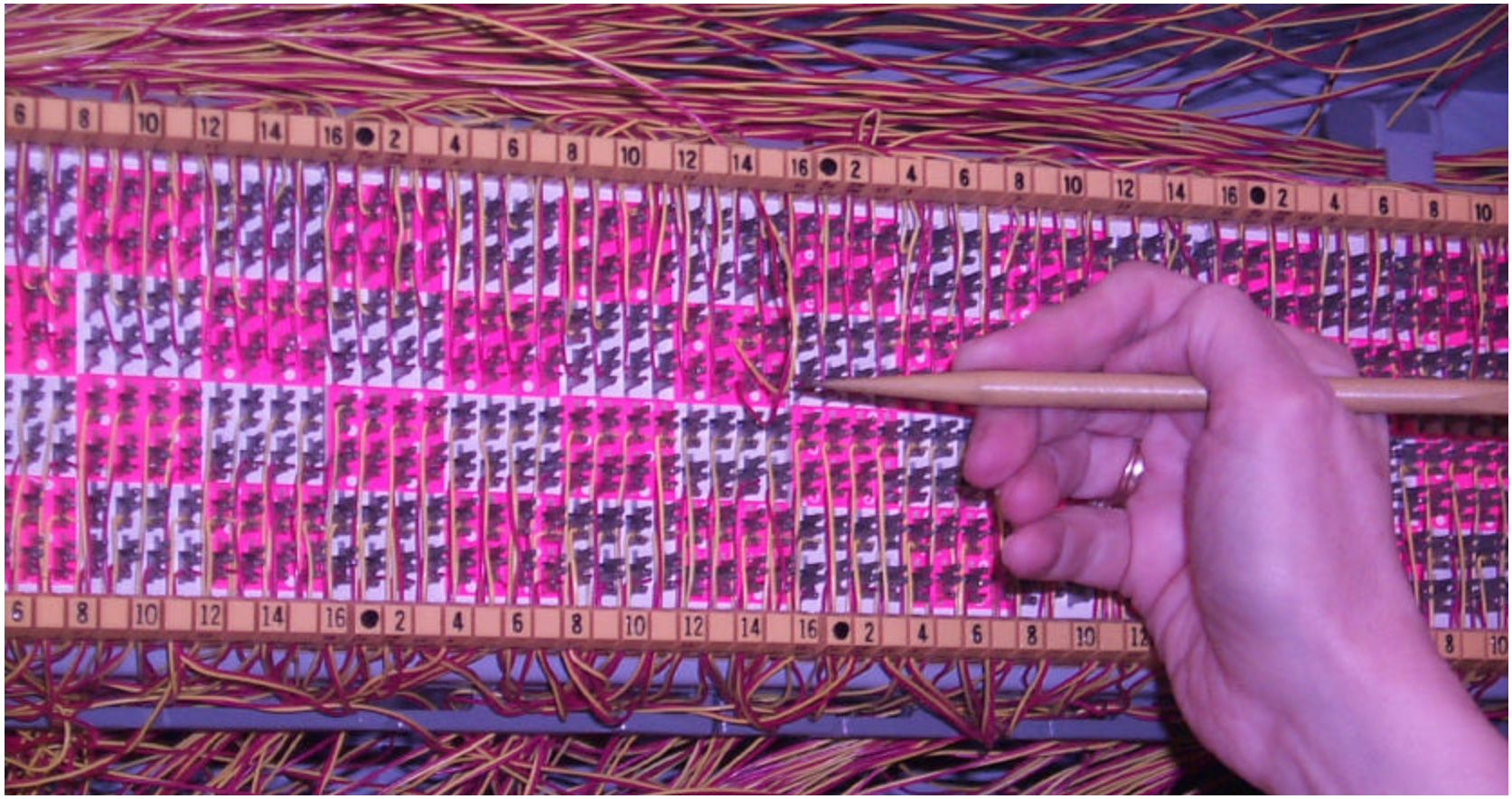
LOOP CUTOVER PROCESS

Step 8: Technician locates and removes end of jumper connected to the BellSouth cable pair.



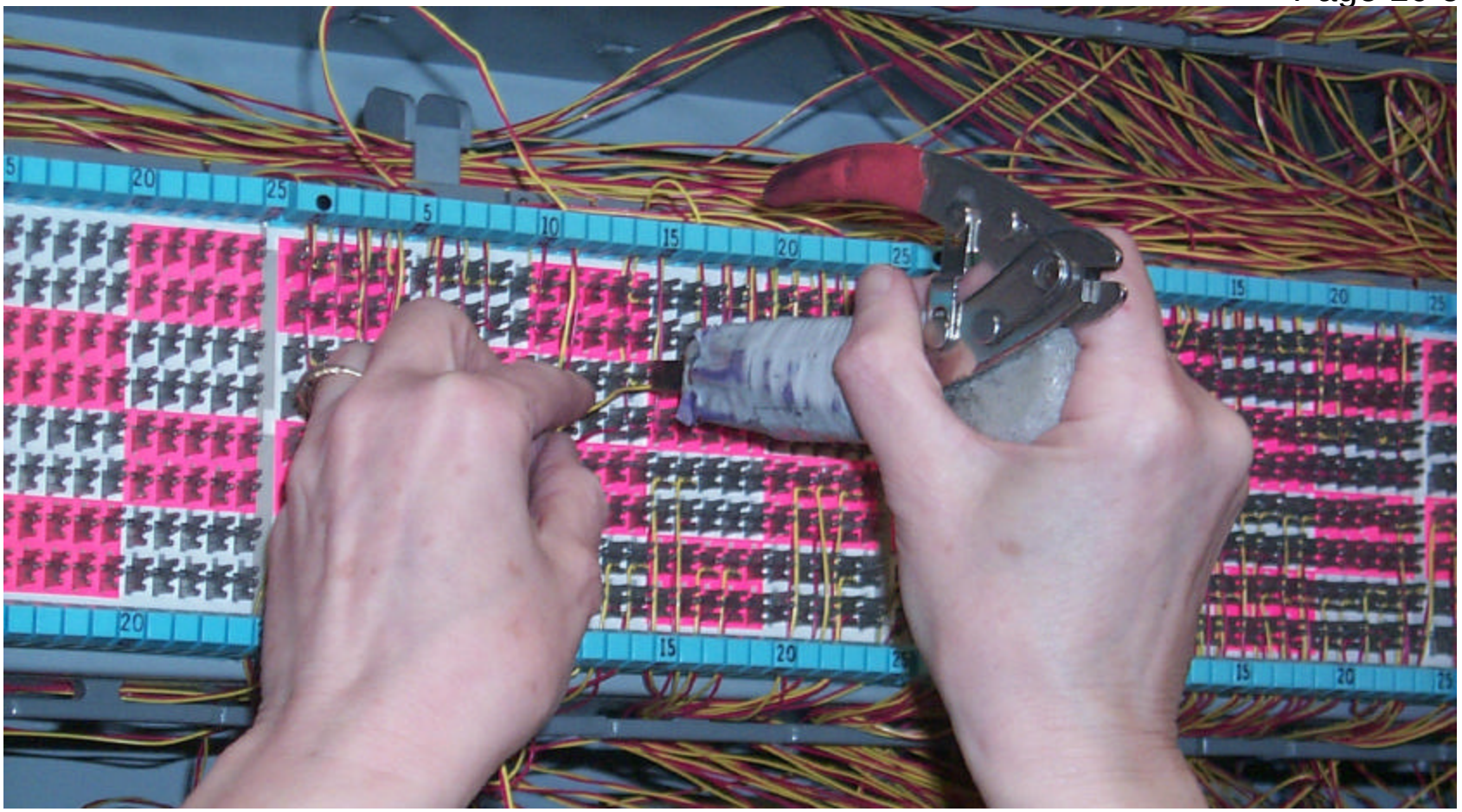
LOOP CUTOVER PROCESS

Step 9: Technician locates and removes end of jumper connected to the switching equipment.



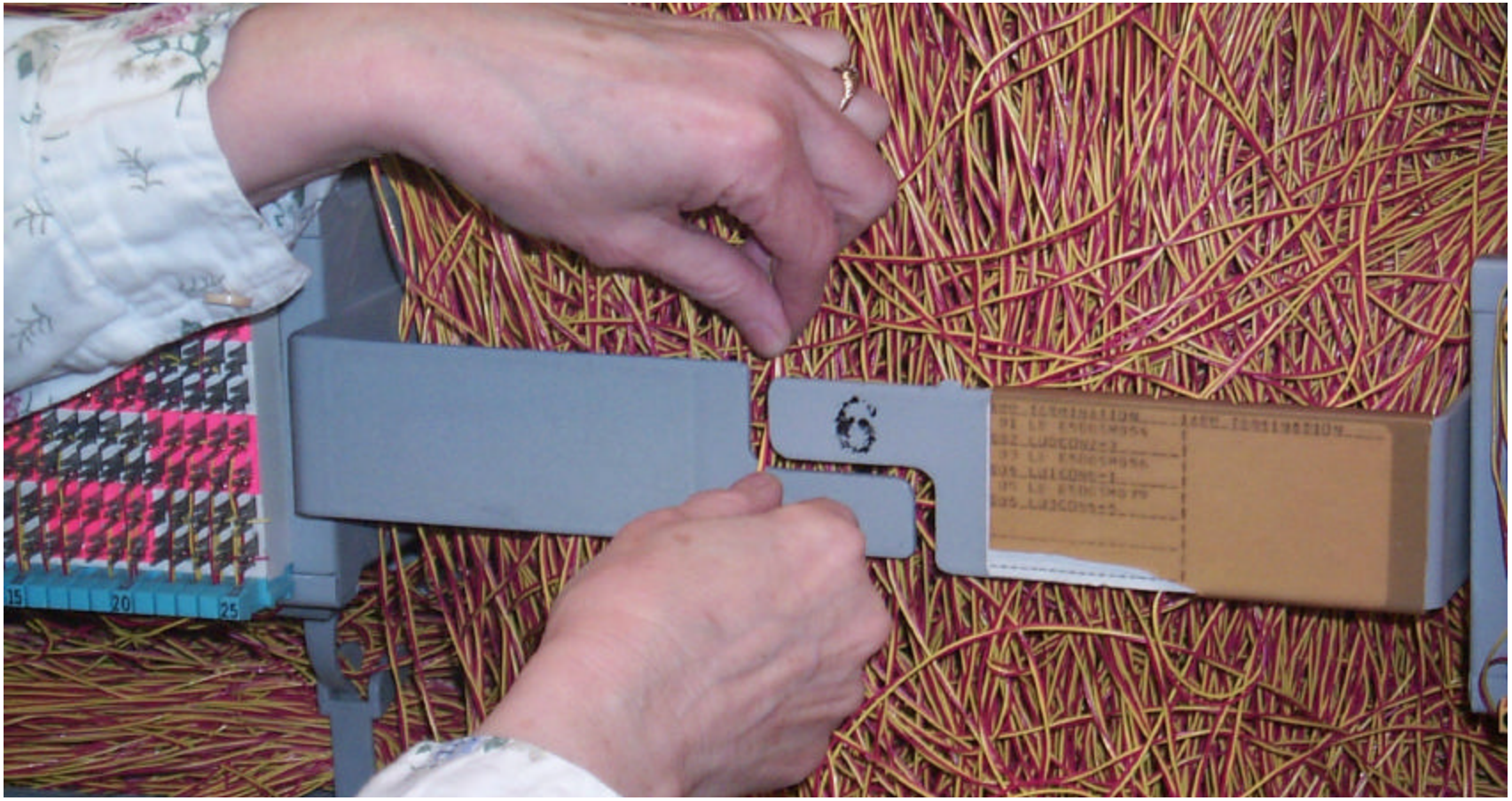
LOOP CUTOVER PROCESS

Step 10: Technician places new jumper on MDF.



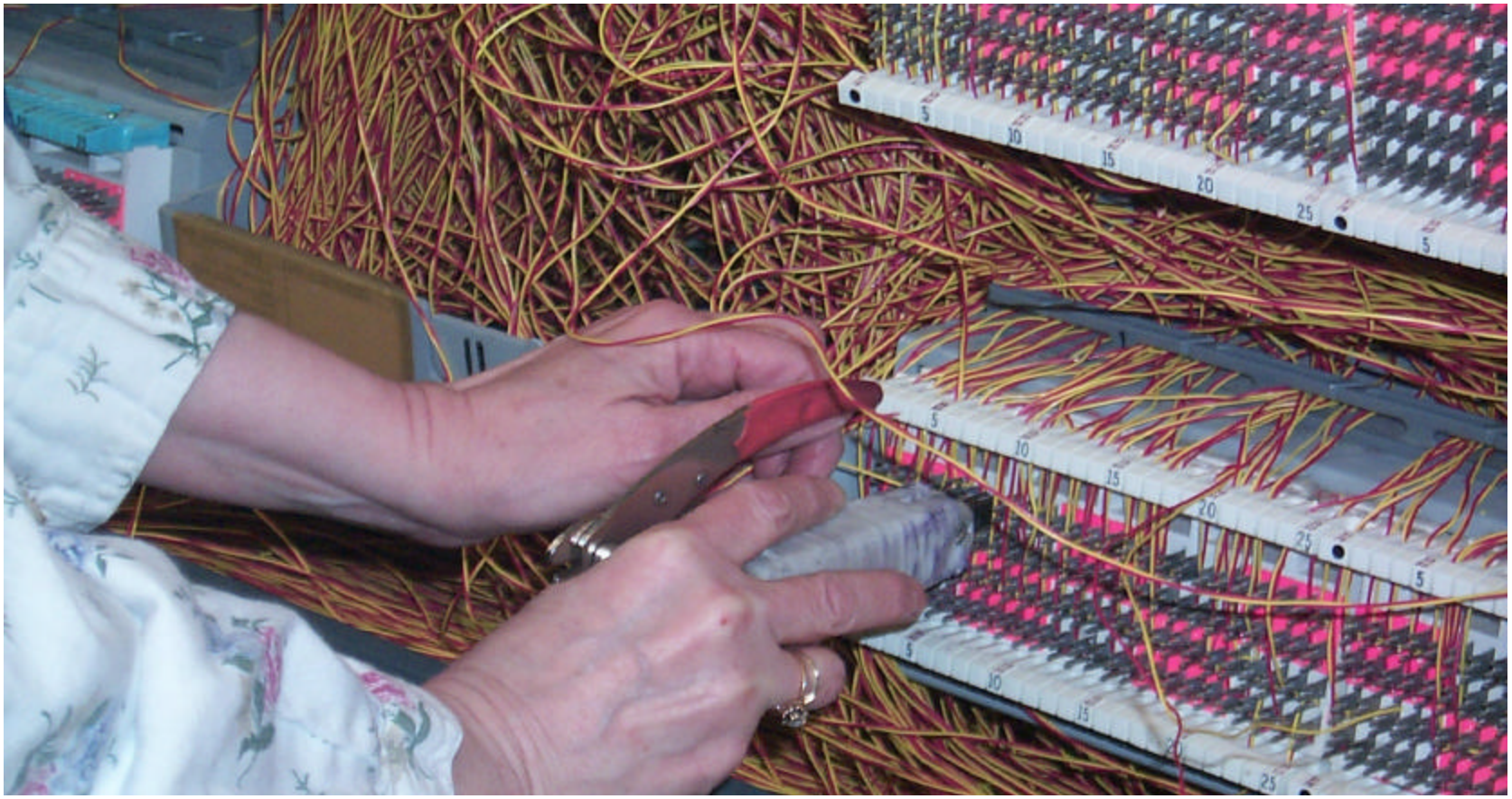
LOOP CUTOVER PROCESS

Step 11: Technician weaves wire through cable rack to reach tie cable to CLEC's collocation equipment.



LOOP CUTOVER PROCESS

Step 12: Technician connects new jumper on frame to tie cables to CLEC equipment.



LOOP CUTOVER PROCESS

Step 13: Technician conducts ANAC test to verify that loop has been cut to correct CLEC switch port.

LOOP CUTOVER PROCESS

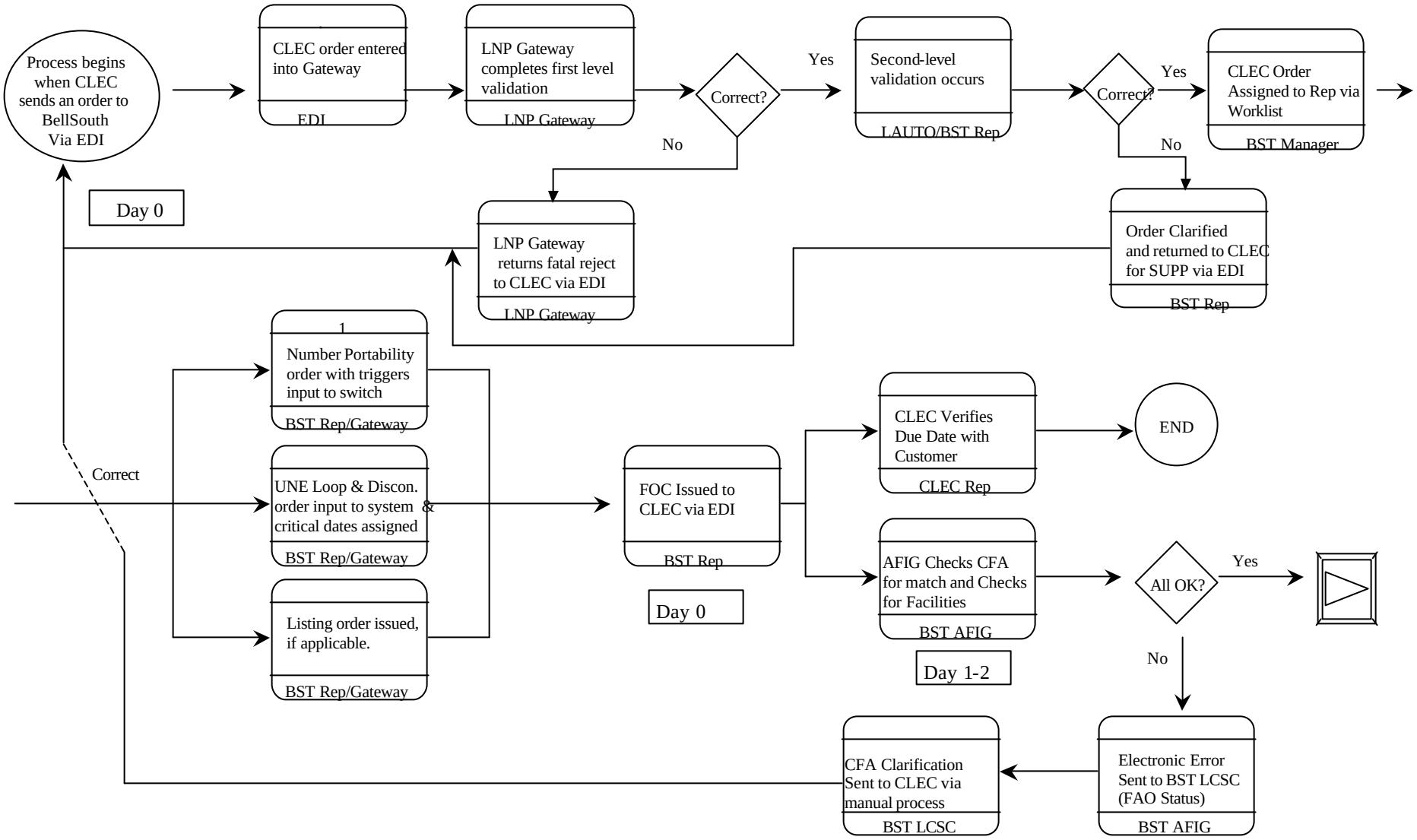
Step 14: Technician verifies cutover with CLEC, closes order, and notifies the UNE Center.

Exhibit No. WKM – 4

Coordinated Hot Cut Process

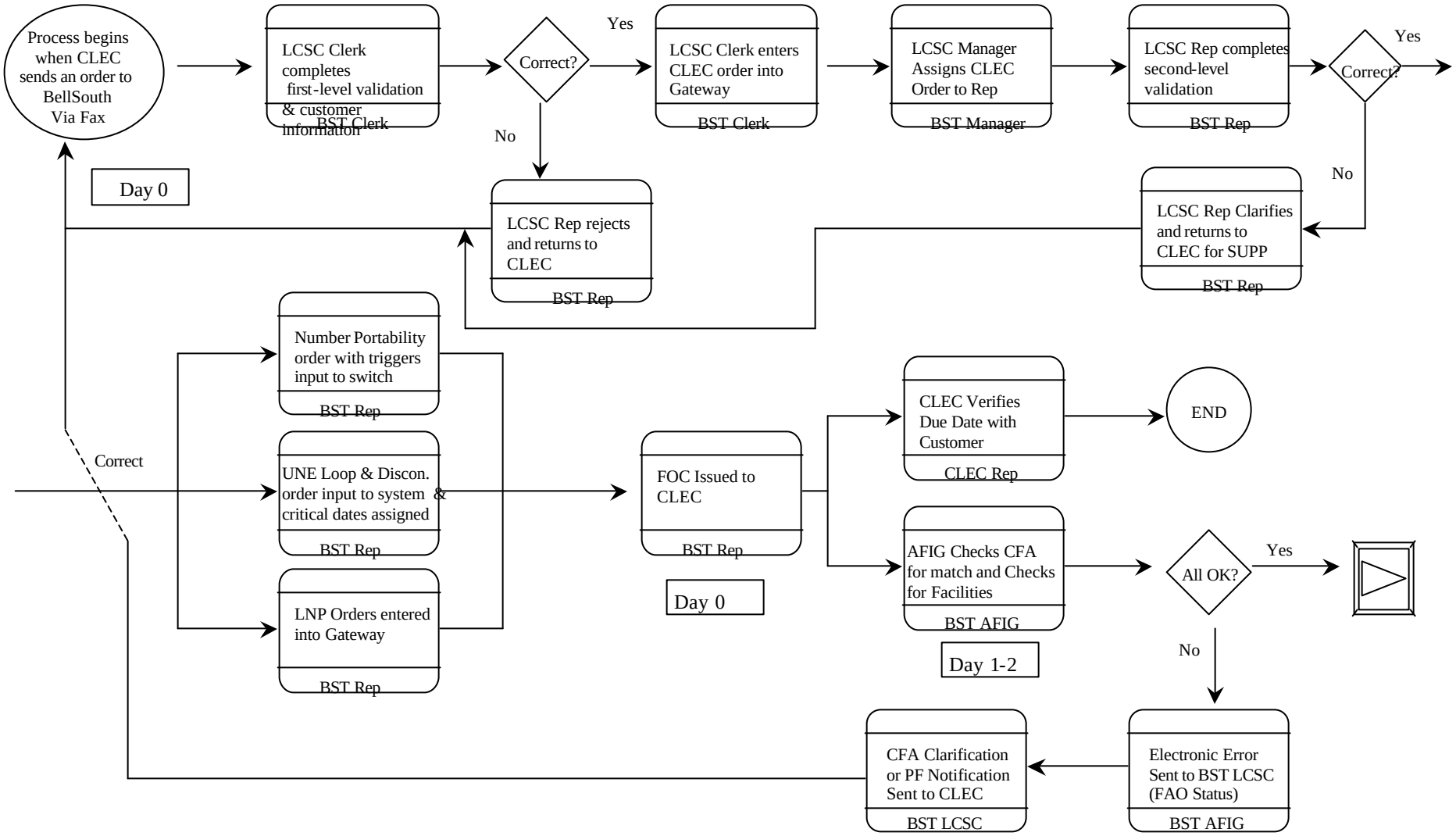
Issue 2
4/18/00

Assumptions: SL2 loop with LNP or XDSL loop with LNP also assumes for XDSL loops that a Loop make up has been processed either manually or electronically prior to submission of the LSR.. LNP Gateway communicates with NPAC.

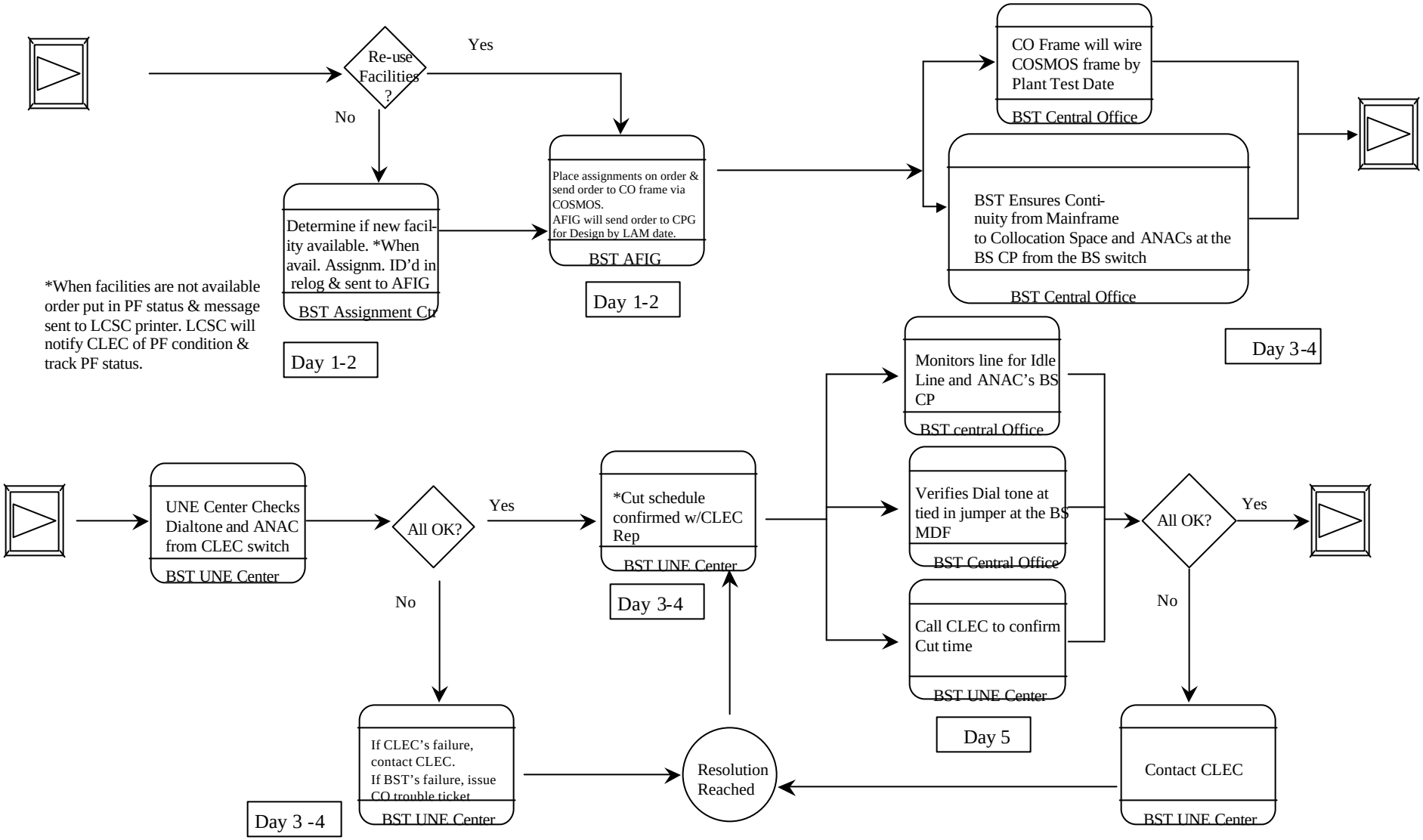


Issue 2,
4/18/00

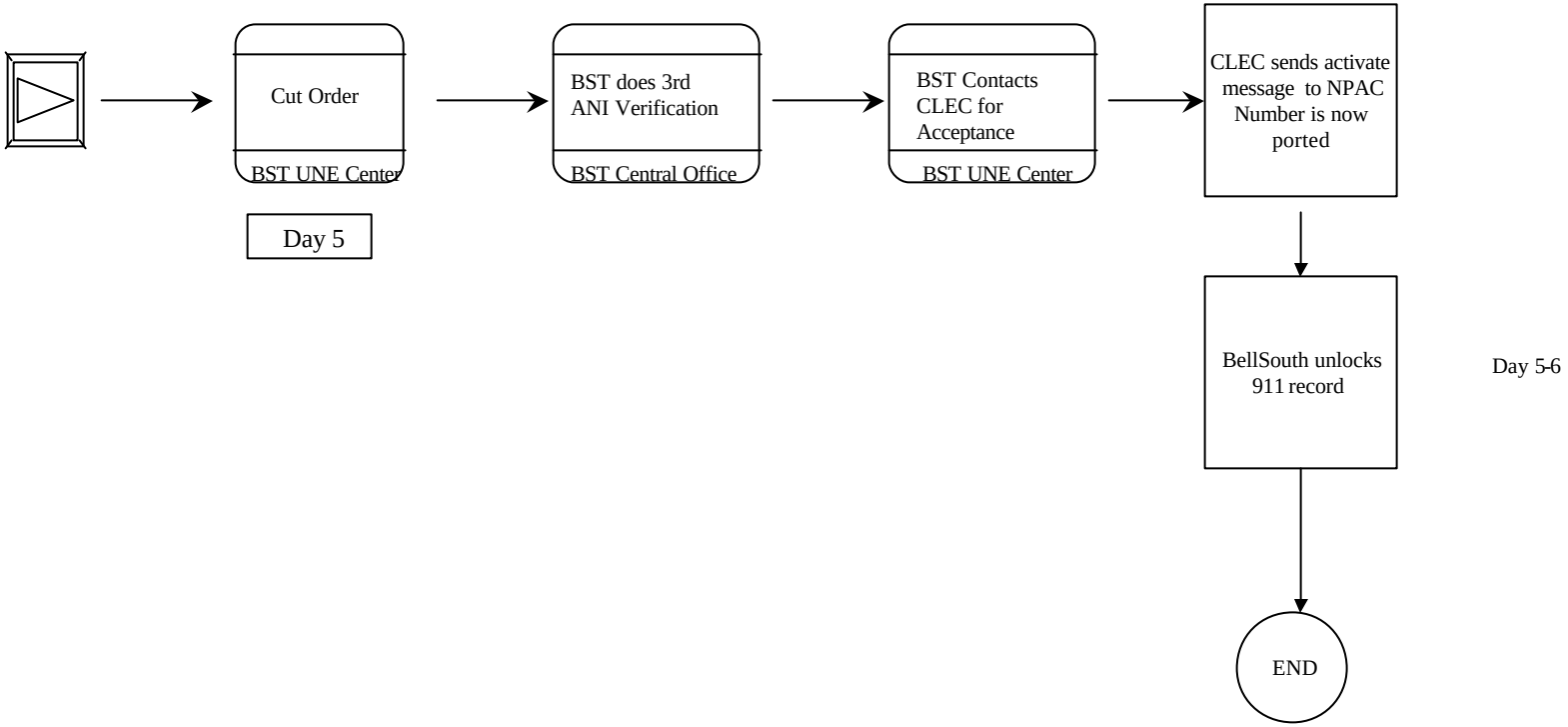
Coordinated Hot Cut Process



Coordinated Hot Cut Process



Coordinated Hot Cut Process



The intervals depicted are business days and assume the order is transmitted and processed mechanically and or manually or electronically and requires manual handling, and received by the LCSC prior to 10 AM location time of the respective LCSC. Manual requests or requests requiring manual handling received after 10 AM, add 1 business day.
The LCSC is located in Bir/Atl
The AFIG is located in Tn
The UNE Center is located in Bir/Atl
The Co is located in Tn
The CPG is located in Tn

WKM-5 a-c

Exhibit No. WKM – 5 a-c

Non-design Unbundled Voice Loops and Non-design Unbundled Sub-Loops UNE Center Procedures

Conversion Coordination

PRESERVICE: For coordinated UVL or USL conversions the UNE Center will contact the CLEC 24/48 hours prior to due date to confirm conversion date and time. Time specific requests by the CLEC is identified on the service order behind the OCOSL USOC. The UNE center will hand off an appointment ticket within 48 hours prior to the Due Date, or as soon as possible upon receipt of the assignments on the order. Coordinated non time specific requests will be scheduled at the discretion of the UNE center and CLEC notified. Non coordinated SL1s will not have pre Due Date notification by the UNEC. Prior to the coordinated conversion the UNEC will check COSMOS for an ID jeopardy to ensure the CO is wired. If COSMOS / FOMS does not show the ID jeopardy, the UNEC will call the CO to determine pre-wiring status.

DUE DATE: .For coordinated SL1 UVL conversions the UNEC will contact the CO. Handoff for a test assist ticket does not apply on SL1's. The UNEC will have the C.O. Tech access the existing BellSouth Cable and Pair at the cut point. The C.O. Tech will ANAC the BellSouth line to ensure the assignments on the order are correct. The UNEC and C.O. Tech will resolve any discrepancies. The UNEC will then have the C.O. Tech check for CLEC dialtone on all circuits at the cut point. CLEC dialtone must be present on all circuits for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy.

- CLEC will be notified on due date of conversion. If contact is unsuccessful, conversion will proceed at appropriate time.
- If CLEC dialtone is present, continue to next paragraph.
- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
    - ♦ If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this work step.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the allotted time, repeat this work step.
        - ➢ If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

When CLEC dialtone has been verified the cut will begin. The UNEC will start the Coordinated

Cut Scheduling System (CCSS) conversion timer as appropriate. After the C.O. Tech advises the UNEC the cutover has been completed the UNEC will stop the CCSS conversion timer. Have the C.O. Tech go to the end user side of the cut point. Then use the
CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the
CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next work step.
- If the numbers are different, have the C.O. Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

Notify the CLEC of the completed conversion.
Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS. For coordinated USL conversions, the UNEC will wait for the outside technician to get to the crossbox or equipment room. The UNEC should have the FWG Tech ANAC the BellSouth pairs prior to conversion to verify assignments. CLEC dialtone will also be verified prior to the conversion. The CLEC will then be advised that the cut will begin. The UNEC will document the conversion time in CCSS as appropriate. Upon CLEC acceptance the associated service orders will be completed in WFA and SOCS.

DUE DATE: SL1 UVL non coordinated conversion due date activities for the UNE Center require only post conversion notification to the CLEC and tracking for network order completion. The UNEC will be notified of order completion by EnDI and the UNEC will place a notification call to the CLEC. The UNEC will follow up on any order pending completion as of 3:30 PM on the due date. The UNE Center will escalate all pending orders to the WMC in order to meet the service due date. The UNE Center will also be the CLEC point of contact for any SL1 non coordinated order provisioning issue. The UNE Center will complete or validate completion of the service order after CLEC notification.

Designed 2 Wire Loop and Ground Start - Unbundled Voice Loop
UNE Center Procedures

Testing

Pre-Service Testing Requirements for Due Date

Once wiring steps have posted complete in WFA/DI, perform all pretesting that is applicable. It is very important that continuity has been verified from the interface facility of the CLEC to the main frame of the Unbundled Loop. The UNEC should validate via dial tone verification test if test points are available. If test points are not available the UNEC will hand off to the CO for a test assist. The UNEC must TEST, TRACK, and ESCALATE until all pre-work has been completed. The CLEC will be contacted 24 to 48 hours prior to DD to confirm conversion schedule. The UNEC will attempt to handoff an appointment ticket (work-type AP) within 48 hours of the DD, or as soon as possible upon receipt of the engineering WORD document.

Check in WFA/C RO field of the OSSOI screen or behind the RRSO FID of the SOCS order for any other related order activity.

Testing Requirements for Due Date

The UNEC tech will handoff an immediate test assist ticket, Work Type IA, to the C.O. The UNEC will then call the C.O. If the handoff goes to the toll group in the C.O. and the toll group does not do these conversions it is the responsibility of the C.O. Toll Tech to get this handoff to the correct person in the C.O. It is not the responsibility of the UNEC to handoff to the frame. The C.O. Tech will show the work time taken to complete the conversion against this test assist ticket.

The CLEC will be notified on the due date of conversion. If contact attempt is unsuccessful, the conversion will proceed at the appropriate time.

For the existing service on the disconnect order, have the C.O. Tech go to BellSouth Cable Pair, pull BellSouth dial tone and ANAC the cable pair and verify that the exiting service on the D order is working to the documented assignments.

- If the existing service is working as documented, continue on to next paragraph.
- If the existing service is not working as assigned, the C.O. Tech will resolve the assignment error. Then redo this workstep.
- If the existing service is in a trouble condition the C.O. Tech will resolve the trouble. Then redo this workstep.

Have the C.O. Tech go to the cut point for Unbundled Loop. Have the C.O. tech check for CLEC dialtone on each of the circuits on the service order. CLEC dialtone must be on all circuits on an order for the conversion to continue. If the CO technician advises the UNEC that the line is in use, the UNEC will contact the CLEC for assistance. At the direction of

the CLEC, the conversion will either be initiated or the order will be placed in an MA status per the UNEC SD/MA policy..

- If dialtone is present at the cut point for each circuit, have C.O. tech begin the conversion. Start the CCSS timer for the conversion, and proceed to the next paragraph.
- If dialtone is not present at the cut point for any one of the circuits, have the C.O. Tech go the the C.O. demarcation point (Collocation Cable and Pair) and test for CLEC dialtone.
    - ♦ If dialtone is present at the demarcation point have the C.O. Technician isolate and clear the wiring trouble in the C.O. Redo this workstep.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the allotted time, repeat this workstep.
        - ➢ If the CLEC cannot correct the problem in the allotted time, the UNEC will call off the conversion and place the order into a MA status according the the UNEC SD/MA policy.

On cutovers that use new facilities, the cut point may be at the F2 facility or at the Network Interface. **It is very important on Network Interface Cut points, that the existing Network Interface is reused.**

Have the Field Work Group (FWG) Tech prior to conversion, go to the cut point pull BellSouth dial tone and ANAC the cable pair and verify that the existing service on the D order is working to the documented assignments.

- If the existing service is working as documented continue to next paragraph.
- If the existing service is not working as assigned, the FWG tech will resolve the assignment error. After the assignment error has been resolved, have the FWG redo this workstep.
- If the existing service is in a trouble condition the FWG tech will resolve the trouble. After the trouble condition has been resolved, redo this workstep.

Have the Field Work Group (FWG) Tech check each circuit on the order for CLEC dialtone. CLEC dialtone must be present on all circuits on the service order to proceed with the conversion.

- If CLEC dialtone is present on all circuits, have the FWG Tech begin the conversion. Start the CCSS timer, and proceed to the next paragraph.
- If CLEC dialtone is not present on all circuits, the UNEC will coordinate the FWG Tech and a C.O. Tech in determining if CLEC dialtone is present at the C.O. demarcation point (CLEC Cable and Pair).
    - ♦ If dialtone is present at the demarcation point, have the C.O. and FWG Techs isolate the wiring trouble and repair. Repeat this work step.
    - ♦ If dialtone is not present at the demarcation point, the C.O. Technician will inform the UNEC. The UNEC will inform the CLEC and give the CLEC 15 minutes to correct the problem.
        - ➢ If the CLEC can correct the problem in the alloted time, repeat this work step.
        - ➢ If the CLEC cannot correct the problem in the alloted time, the UNEC will call off the conversion and place the order into a MA status according the

the UNEC SD/MA policy.

Due to contract negotiations the CLECs have the opportunity to specify a time window for the cutover. The negotiated time for conversion must be met. Failure to do so could result in rebating the non-recurring service order charges back to the CLEC based on contract language.

After the cutover is complete have the C.O. Tech/FWG Tech go to the end user side of the cut point. Then use the CLEC ANAC code, to ANAC the UVL. Note the CLEC number and match against the CLEC telephone number associated with the UVL on the cut sheet.

- If the numbers match, continue on to next workstep.
- If the numbers are different, have the C.O. Tech/FWG Tech isolate and clear the trouble. After the trouble has been resolved redo this step.
- If the numbers are different, but no BellSouth trouble can be isolated and cleared, inform the CLEC that they may have a potential translations problem in their switch. There are certain types of legitimate end-user services where the telephone number you call to reach that end-user, and the telephone number you hear when you ANAC the circuit will be different. The CLEC will have to determine if this is the cause of the ANAC mismatch. An example of when this will occur is with terminals within a Multiline Hunt Group (MLHG). Usually the terminals in the MLHG will ANAC the Main Telephone Number assigned to terminal one (1) in the group.

After the CO technician advises the UNEC that the cutover has been completed, the UNEC will stop the CCSS conversion timer and notify the CLEC of the completed conversion

9.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

9.1 **SL2 Unbundled Loop Design Circuits**

9.2 All designed circuits will be manually coordinated by the UNE Center
2 WFA/DI Tickets Issued
PSA Ticket to provision TIRKs Circuits
LNP or UNE Ticket to provision the COSMOS Circuits

9.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone or Signaling is not required. A cross office continuity test must be preformed. The WFA/DI tickets must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

9.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth CP) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP on or before WOT date. If this is a voice grade circuit, the BellSouth line should be ANAC'd to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the Central Office (CO) will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

9.5 PSA ticket with a WOT step should be completed 100%.

9.6 LNP ticket should be completed 100%.

9.7 UNE Center will issue a SPLAP (work code of NT) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office or outside of normal business hour cuts, the CO technician should notify the Network Manager and complete ticket 100%. The TIRKS engineering is not always available 48 hours prior to due date so the UNE Center will issue the appointment ticket as soon as the engineering is available.

9.8 UNE Center will issue a SLPIA ticket and call the CO to cut the circuits.

9.9 CO will advise UNE Center to Hold and proceed to cut location (BellSouth CP).

9.10 If voice grade circuit, CO will test for CLEC Dial Tone (DT) at tied in jumper.

9.11 If No Dial Tone (NDT), CO will go to Demarcation point (POT) and test for CLEC DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes, and retest on CLEC side. When NDT condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NDT condition is on. If a multi-line order, no cuts will be made if NDT condition exists on one or more circuits.

9.12 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.13 If DDS grade circuit, CO will test for proper Signaling at tied in jumper.

9.14 If No Signaling (NS), CO will go to Demarcation point (POT) and test for CLEC Signaling. When NS condition exists from CLEC equipment, CO will advise UNE Center of specific CLEC CP that NS condition is on. If a multi-line order, no cuts will be made if NS condition exists on one or more circuits.

9.15 If Signaling is present at tied in jumper, CO will advise UNE Center that they are ready to begin the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will advice UNE Center when all circuits have been cut. CO will remain on line with UNE Center until CLEC has accepted circuit.

9.16 When UNE Center advises CO that CLEC accepted circuit, the CO will complete the SLPIA ticket 100%.

NOTE 1: If Unbundled DS1 Loops (Hicap), the WFA/DI tickets will be SPAH for provisioning, HISAP for the appointment ticket, and HISPIA for the cut.

NOTE 2: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

10.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

10.1 **SL1 Unbundled Loop Non-Designed Circuits with a Frame Due Time (FDT) of 9:00pm**

10.2 Non-designed circuits with a FDT of 9:00pm (Circuit ID of TYNU) will be voice grade circuits and will be manually coordinated by the UNE Center. A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order. The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

10.3 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists Central Office (CO) will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

10.4 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the due date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

10.5 After successfully wiring and testing, the COSMOS WPN will be placed in ID jeopardy (Hold for Call) and the WFA/DI ticket will be completed 100%. The 'Start Date and Time' fields must be completed.

10.6 The Frame Output will be filed in a unique ID Jeopardy folder, bin, file, etc. on the local frame desk.

10.7 UNE Center will issue a NDSAP (work code of ND) ticket notifying CO of cut 48 hours prior to due date. For a non-attended office, outside of normal business hour cuts, or if a Time Specific cut, the CO technician will notify his/her Network Manager and complete ticket 100%. Orders are not always assigned 48 hours prior to Due Date so the UNE Center will input the appointment ticket as soon as the Order is available.

10.8 UNE Center will call the CO to cut the circuits.

10.9 CO will advise UNE Center to hold and proceed by testing for Dial Tone (DT) from the CLEC at the tied in jumper at the BellSouth CP. If multi-line order, DT should be checked on all circuits prior to making any cuts. No circuits are to be cut if No Dial Tone (NDT) condition exists on one or more circuits.

10.10 If NDT, CO should proceed to the CLEC Demarcation point (POT) and test for DT. If CLEC DT is not present, CO will remove the bridging clips, wait 2 minutes and retest on CLEC side. If NDT from CLEC equipment, CO will notify UNE Center of problem with specific CLEC CP having NDT condition.

10.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will notify the UNE Center that the conversion can not continue and the UNE Center will direct further activities. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'ed, CO will advise UNE Center that they are ready and to start the conversion. CO will remove jumper from BellSouth Cable Pair and terminate tied in jumper. CO will ANAC the line and report the CLEC TN to UNE Center. CO will remain on line with UNE Center until CLEC has accepted circuit.

10.12 CO will remain on the line with the UNE Center until they report acceptance from the CLEC.

10.13 CO will create a SONPK ticket in WFA/DI to report conversion time and complete the order directly in COSMOS.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.

11.0 CENTRAL OFFICE UNBUNDLED LOCAL LOOPS PROVISIONING JOB AID

11.1 **SL1 Unbundled Loop Non-Designed Circuits With A Frame Due Time (FDT) of 3:30pm**

11.2 Non-designed circuits with a FDT of 3:30pm (Circuit ID of TYNU) will be non-coordinated voice grade circuits. Central Office (CO) will cut these circuits anytime on the DUE DATE.

11.3 A single WFA/DI ticket (LNP or UNE) will be issued for the provisioning of each order.

The LNP or UNE ticket will contain the COSMOS Work Package Number (WPN).

11.4 **UNE** tickets will consist of orders with all facilities in a Spare Pending Connect Status. These orders may be wired, tested, and completed prior to the order Due Date. Presence of CLEC Dial Tone is not required. If No Dial Tone (NDT) exists CO will perform a cross office continuity test. The WFA/DI ticket must be completed 100%. The 'Start Date & Time' fields must be populated prior to WFA/DI ticket completion.

11.5 **LNP** tickets consist of orders reusing the BellSouth Cable Pairs (CP). These circuits must be wired (made ready at the BellSouth Cable Pair) and a cross office continuity test performed from the CLEC demarcation point (POT) to the tied in jumper at the BellSouth CP before the Due Date. CO will ANAC the BellSouth line to insure Database integrity. If the TN that is ANAC'd and the TN in COSMOS do not match, the CO will place this order in A1 jeopardy with a remark noting the actual working TN on that Cable Pair.

11.6 After successfully wiring and testing, the WFA/DI ticket will be completed at 10%.

11.7 Frame output should be filed by Due Date at the Frame desk.

11.8 The CO will cut the circuit(s) on the Due Date.

11.9 If No Dial Tone (NDT) on the tied in jumper, CO will proceed to the CLEC Demarcation point (POT) and test for DT. If DT is not present, CO will remove the bridging clips wait 2 minutes, and retest on CLEC side. If NDT from CLEC, CO will place the COSMOS WPN in I4 jeopardy, complete the WFA/DI ticket at 20%. On multi-line orders no circuits are to be cut if NDT condition exists on one or more circuits.

11.10 The Frame Output will be filed in a unique I4 Jeopardy folder, bin, file, etc., on the local frame desk.

11.11 If CLEC DT is present at tied in jumper, CO will monitor the BellSouth line. If the line is idle, CO will ANAC the BellSouth TN. When the line is not idle, CO will monitor the BellSouth line every 5 to 10 minutes until the line is idle. If the BellSouth TN does not match the Service Order, CO will locate the correct CP. When CLEC DT is present on the tied in jumper and the BellSouth TN is ANAC'd, CO will lift off jumper at BellSouth CP and terminate the tied in jumper. CO will complete the WFA/DI ticket 100% as soon as cut is completed. The 'Start Date and Time' fields must be completed prior to WFA/DI ticket completion.

NOTE 1: The industry standard ANAC number is 800-223-1104. If this number does not work contact the UNE Center and have them acquire the CLEC's ANAC number.