



RECEIVED

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Attorney

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NOV 14 PM 3 54
November 14, 2002

TN REGULATORY AUTHORITY
DOCKET ROOM

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996*
Docket No. 97-00309

*Petition of BellSouth Long Distance, Inc. to Modify its CCN for
Authority to Provide Resold InterLATA Service*
Docket No. 02-01169

Dear Chairman Kyle:

Enclosed is the nonproprietary portion of the response to the Staff's Data Request dated November 7, 2002.

A copy of this response is being provided to all parties of record.

Very truly yours,

Joelle Phillips
for BellSouth Telecommunications,
Inc.

Guilford Thornton
for BellSouth Long Distance, Inc.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
Docket Nos. 97-00309 and 02-01169
Item No. 1
Page 1 of 1

REQUEST: Did BSLD, or any other BellSouth affiliates, send any form of marketing information to any Tennessee subscribers, or contact them by phone advertising BellSouth as being available an interLATA carrier capable of providing interLATA services in Tennessee? If so, please provide a copy of the marketing information and/or a copy of the script used in the verbal contacts. Also, identify the number of Tennessee customers receiving such information. Please describe all other marketing of interLATA services done by or on behalf of BSLD in Tennessee.

RESPONSE: No. Neither BSLD nor any BellSouth affiliate, sent any marketing information or contacted Tennessee subscribers by telephone representing that BellSouth Long Distance was available as an interLATA carrier capable of providing interLATA service prior to BellSouth receiving authorization to provide in-region interLATA service.

BellSouth engaged in no marketing to Tennessee subscribers indicating it was capable of providing interLATA services in Tennessee.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
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Item No. 2
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REQUEST: After the changes to the SOER edits were made on October 1, 2002, that allowed the orders of the Georgia customers served from Tennessee to select BellSouth as their interLATA carrier, what type of orders did the system allow to flow through that should not have? Please provide a list of the customers including name, address, class of service and serving central office. Also indicate whether these were new or existing BellSouth service customers.

RESPONSE: After the above mentioned changes to the SOER edits were made on October 1, 2002, and before those edits were corrected on October 10, 2002, the system would allow all retail orders selecting BSLD as the interLATA carrier to flow through, including new connects and change orders. Orders for both new and existing BellSouth retail customers selecting BSLD as their interLATA provider were no longer blocked after the change.

See the response provided in the Proprietary Attachment to Item No. 4 for the requested customer information.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
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Item No. 3
Page 1 of 2

REQUEST: Please describe in detail the circumstances surrounding the discovery by BellSouth that it had processed the orders referred to in Item 2 above in error. Please include how and by whom the discovery was made and the associated time line.

RESPONSE: BellSouth Long Distance first discovered this situation on October 8, 2002 as a result of its standard screening process described below:

SCREENING PROCESSES:

Step 1: The Customer Information System (CIS) is monitored daily to identify customers PICed to BellSouth Long Distance with telephone numbers in states in which BellSouth has not received authorization to provide in-region interLATA services. If customer records are found, immediate steps are taken to remove the customer's records from BellSouth Long Distance's billing system.

Information for all customer telephone numbers PICed to BellSouth Long Distance in states in which BellSouth has not received authorization to provide in-region interLATA services is sent immediately to BellSouth Telecommunications, so that the customer can be contacted and his or her PIC changed.

Step 2: Every Tuesday and Thursday, usage in BSLD's Traffic Error Correction System (TECS) is screened for call records originating from numbers in states in which BellSouth has not received authorization to provide in-region interLATA services. If such call records are found:

- Records are removed from the BSLD billing system.
- Information pertaining to calls that appear to be fraudulent is sent to the network group for investigation and analysis.
- Once analysis is performed, steps are taken to prevent future occurrences of fraudulent activity.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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Page 2 of 2

Summary: The removal of pre-relief state customer information (**Step 1**) from the BSLD billing system ensures that associated usage cannot bill – it has no associated billing account. As a result, calls made from pre-relief state numbers error into the Traffic Error Correction System (TECS). Screening of TECS (**Step 2**) removes and investigates pre-relief state call records.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
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Item No. 4
Page 1 of 1

REQUEST: The attached letter indicates that no customers were billed for interLATA usage. Did BellSouth or BSLD actually provide interLATA services to any of the customers referred to in Item 2 above (i.e., complete any interLATA calls for Tennessee customers)? If so, please provide a list of those customers along with the amount of interLATA minutes of use for each and the date BellSouth commenced providing them interLATA service. Additionally, please explain in detail how and when the customers were notified of the error along with a copy of any written notices that may have been sent to them and/or a copy of any scripts that may have been used in any verbal contacts with the customers involved.

RESPONSE: Twenty-two orders were accepted and service provisioned for customers in Tennessee selecting BSLD as their interLATA long distance provider. These customers were able to, and some did, make interLATA calls. However, BellSouth did not bill for this usage. Information relating to each customer is provided in the Proprietary Attachment to this request.

The list of customers/accounts where BSLD service was provided prior to BellSouth receiving authorization to provide in-region interLATA services was first sent to the Regional Support Center (RSC) on October 8, 2002. The request was made for the customer contact, described in response to Request No. 5, to begin that day. Updates to the list of customers were forwarded to the RSC as additional cases were identified and were handled in the same manner. No scripts were provided to the representatives to use.

See also BellSouth's response to Item No. 5.

REQUEST: Please describe in detail the process by which the subscribers above were transferred to other interLATA carriers after the discovery was made that BellSouth had processed their service orders in error.

RESPONSE: Consumer:

BellSouth Representatives contacted customers by phone to advise they had erroneously been allowed to select BellSouth Long Distance service prior to BellSouth receiving authorization to provide in-region interLATA service.

The representatives explained that BellSouth Long Distance service was not yet available in Tennessee and that the customer needed to select another carrier if they wanted an interLATA long distance provider.

For those customers directly reached, a correction order was issued to change the customer to their carrier of choice. However, for those customers where a voice message had to be left, the representatives advised the customer of the error, advised the customer that their carrier was changed to none (no selection) and further advised the customer to contact BellSouth to select a specific carrier for interLATA service.

Business:

Once the sales associates were notified of the situation, they issued service orders to remove BSLD as the interLATA carrier selection for the affected customers. The associates then contacted the customers by telephone and informed them that BellSouth Long Distance service was not yet available in Tennessee, and thus they would have to select another interLATA carrier. The sales associates offered to read a selection of available interLATA carriers.

After each customer made a decision regarding their interLATA choice, the sales associates issued service orders to reflect the customer's choice.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
Docket Nos. 97-00309 and 02-01169
Item No. 6
Page 1 of 1

REQUEST: Please identify the cross boundary area that required the additional code update on October 18, 2002.

RESPONSE: The cross boundary area that required the additional code update on October 18, 2002 was the 931 NPA of Tennessee. The condition allowed Tennessee cross boundary orders with 931 NPA issued out of the Kentucky RAO to process between the dates of October 1st through the 18th, inclusive.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
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REQUEST: Has BellSouth verified that the changes made on October 9, 2002 and October 18, 2002 have not negatively impacted any other of BellSouth's OSS used by competitors to provide service to their customers?

RESPONSE: No changes were made to the platforms used by competitive carriers to provide service to their customers. There have been no negative impacts to BellSouth's OSS for the processing of competitive carriers' service requests.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
Docket Nos. 97-00309 and 02-01169
Item No. 8
Page 1 of 1

REQUEST: Please provide a copy of any and all written correspondence sent to the FCC and/or any other state utility commission concerning this matter.

RESPONSE: See the attached documentation.

BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
November 7, 2002
Docket Nos. 97-00309 and 02-01169
Item No. 8 Attachment

BELLSOUTH

BellSouth Corporation
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kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

October 30, 2002

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 – Ex Parte # 2

Dear Ms Dortch:

On October 29, 2002, BellSouth filed a written *ex parte* with the Commission describing the company's discovery that a small number of customers in Florida and Tennessee were allowed for a short period of time to select BSLD as their interLATA long distance provider although BellSouth did not have authorization to provide such service and the steps that BellSouth took to cure this situation. This is to inform you that on October 30, 2002, I spoke by telephone with Christine Newcomb of the Wireline Competition Bureau's Competition Policy Division. The purpose of the conversation was to answer some questions Ms. Newcomb had that were prompted by the October 29 *ex parte*. In particular I told Ms Newcomb that during the period that these 24 customers were allowed to select BSLD as their interLATA long distance provider, they could and did place interLATA calls, but BellSouth did not bill them for such calls.

Ms. Newcomb also asked whether a customer residing in a state for which BellSouth had not received 271 authorization who was served by an office in a state for which such authorization had been granted could place an interLATA call through BSLD by "dialing around." I explained to her that such a call, as well as any 1010377 call dialed within the BellSouth nine-state region, will be blocked in the BSLD switch receiving the call, with the caller receiving an announcement that the call cannot be completed as dialed. BSLD has chosen not to accept any casual dialed calls in its network. All BST switches within the nine-state region that receive 1010377 calls will route the calls to the BSLD for handling as described above. BST switches cannot be programmed to selectively block only certain 101XXXX codes.

In accordance with Section 1.1206, I am filing this notice and the accompanying attachment electronically and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen B. Levitz". The signature is fluid and cursive, with the first name being the most prominent.

Kathleen B. Levitz

cc: Christine Newcomb
Janice Myles
James Davis-Smith
Luin Fitch
Sara Kyle
Beth Keating

BELLSOUTH

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Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

November 8, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 – Ex Parte # 1

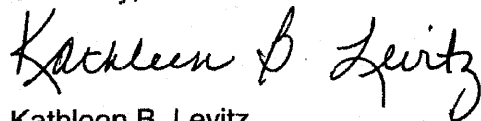
Dear Ms. Dortch

This is to inform you that on November 7, 2002, Ernest Bush, Jonanthan Banks, Robert Blau and I, representing BellSouth met with William Maher, Chief of the Wireline Competition Bureau and members of his staff including: Scott Bergmann; Michelle Carey; Greg Cooke; Christine Newcomb; and Craig Stroup. Hillary De Nigro and William Davenport of the Commission's Enforcement Bureau also attended. William Ellenberg, representing BellSouth, also participated in the meeting by telephone.

The purpose of the meeting was to discuss BellSouth's uncovering the fact that a small number of customers in Florida, Tennessee and Alabama were initially allowed to select BellSouth Long Distance as their interLATA service provider in states in which BellSouth Corporation had not yet, or had not at the time the service orders were placed, received authorization to provide in-region interLATA services pursuant to Section 271 of the Communications Act of 1934, as amended. BellSouth's presentation at the meeting was consistent with the statements relating to this matter made earlier in the Ex Parte filed by Jonathan Banks on October 29, 2002, and in BellSouth Ex Parte #2, filed in this docket on October 30, 2002. In particular we described the safeguards BellSouth had in place to prevent a reoccurrence of this situation.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the records of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

cc: William Maher
Michelle Carey
Christine Newcomb
Hillary DeNigro
Janice Myles
Luin Fitch
Beth Keating

Scott Bergmann
Greg Cooke
Craig Stroup
William Davenport
James Davis-Smith
Sara Kyle

Almand, Gayle

From: Sims, Nancy H
Sent: Wednesday, November 13, 2002 10:27 AM
To: Almand, Gayle
Subject: FW: Ex Parte filed electronically w/FCC by BellSouth 10/29/02 - WC 02-307 No. 1

Importance: High

-----Original Message-----

From: Sims, Nancy H
Sent: Wednesday, October 30, 2002 5:32 PM
To: 'jchase@psc.state.fl.us'; 'chinton@psc.state.fl.us'; 'ktew@psc.state.fl.us'; 'kgriffin@psc.state.fl.us';
'iortiz@psc.state.fl.us'; 'hmclean@psc.state.fl.us'; 'wdhaesel@psc.state.fl.us';
'bdemello@psc.state.fl.us'; 'rmoses@psc.state.fl.us'; 'lsharvey@psc.state.fl.us';
'bsalak@psc.state.fl.us'
Cc: Criser III, Marshal M; White, Nancy
Subject: FW: Ex Parte filed electronically w/FCC by BellSouth 10/29/02 - WC 02-307 No. 1
Importance: High

For Your Information:

Attached is a copy of BellSouth's recent Ex Parte letter filed with the FCC. We discovered that there were 25 customers who were initially allowed to select BellSouth Long Distance (BSLD) as their interLATA carrier in states in which BellSouth did not yet have long distance approval. Only 2 of these customers were located in Florida. Fortunately we identified the problem almost immediately - before the customers even received any billing - and we have taken immediate action to remove BSLD as the carrier for these customers and to correct the edits necessary to prevent this from happening again. The letter provides a more detailed description of the situation which was related to edits dealing with cross-boundary areas.

Please feel free to call me if you have any questions or need any additional information.

Nancy Sims
(850)222-1201



05D2B000.PDF

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Jonathan Banks
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October 29, 2002

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC 02-307

Dear Ms. Dortch:

The purpose of this letter is to inform you that certain controls in place at BellSouth Long Distance ("BSLD") have uncovered a small number of customers who were initially allowed to select BSLD as their interLATA long distance provider in states in which BellSouth Corporation ("BellSouth") has not yet, or had not at the time the service orders were placed, received authorization to provide in-region interLATA services pursuant to Section 271 of the Telecommunications Act of 1996. As of October 23, these controls have uncovered 25 customers who had selected BSLD as their interLATA provider. Eighteen of these 25 customers are residential customers; 7 are business customers. Twenty-two of the orders were placed by customers in Tennessee, 2 by customers in Florida and 1 by a customer in Alabama. In each and every case, BellSouth has taken immediate steps to remove BSLD as the customer's interLATA long distance provider and to ensure that no billing for any usage occurs.

Florida/Tennessee

As noted above, all but one of the orders are from customers in Florida and Tennessee. These orders should have been prevented from completing by "edits" applied by the Service Order Communications System ("SOCS"). SOCS is the common entry point for all requests for service. The edits referred to are Service Order Edit Routine ("SOER") edits. SOER is an edit routine that reviews orders that have been placed through the retail ordering interfaces used by the BellSouth Telecommunication Inc.'s service representatives. In simplistic terms, SOER "looks" to see that all necessary information, and no inappropriate information, is contained on a request for service. The SOER edit routine is a critical processing component in the creation of a service order to enable the request to be accepted by BellSouth's legacy systems for provisioning.

Ms. Marlene H. Dortch
October 29, 2002
Page 2

Specific edits were in place for the express purpose of preventing orders for BSLD service from being completed in pre-relief states. BellSouth has ascertained that these edits, which would have prevented Florida and Tennessee orders for BSLD services from passing, were unintentionally rendered ineffective by software updates that were implemented to solve other order problems.

Specifically, BellSouth determined shortly after the launch of BSLD services on September 27 in Alabama, Kentucky, Mississippi, North Carolina and South Carolina (the "5 State Order") that legitimate cross-boundary orders were being "blocked" by the SOER edits. Cross-boundary situations involve customers who physically reside in one state but whose service is provided out of a central office in another state. For example, in and around Chattanooga, Tennessee there are a number of customers who reside in Georgia but are served out of an office physically located in Tennessee. These customers are eligible for BSLD services. The SOER edits, however, were causing these legitimate cross-boundary orders to "fall out" of the system for manual handling.

On or about October 1 BellSouth instituted changes to the SOER edits to permit these orders to "flow through." When the checks in place caught several orders that should not have passed the SOER edits, BellSouth investigated. It was determined that the cross-boundary "fix" had the unintended effect of allowing certain orders to pass the edits without recognizing the Florida and Tennessee restrictions.

BellSouth implemented an emergency release to the SOER edits, which was effective on October 9, to correct the situation. BellSouth is continuing to monitor the SOER edits to ensure they are functioning properly. BellSouth has also implemented a "desk top priority" message on service representatives monitors in both Small Business and Consumer customer service offices emphasizing that BellSouth is not yet authorized to provide interLATA services in Florida and Tennessee and that no sales of BellSouth Long Distance services are permitted to be made in those two states.

One order was received from a customer residing in Tennessee after BellSouth believed that the SOER edits had been "fixed." It was subsequently determined that the SOER edit fix did not correct the problem in one cross boundary area. That situation was fixed by an additional code update on October 18.

Alabama

Finally, one order was accepted for an Alabama customer prior to BellSouth receiving authorization to provide in-region interLATA services in the 5 State Order on September 18, 2002. This isolated case was a result of the same SOER edits that caused the cross-boundary concerns discussed above. In this case, however, it was a failure of a date specification in the

Ms. Marlene H. Dortch
October 29, 2002
Page 3

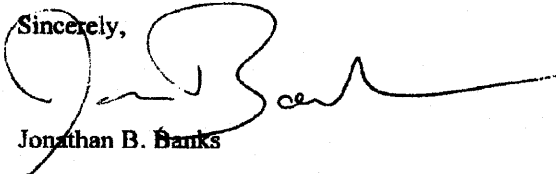
underlying code that allowed an order for BSLD service to flow for an Alabama customer who obtains local service from a central office located in Georgia. These edits were intended to ensure that orders for BSLD services would not "flow through" for customers in the 5 states until September 27 (the date specification). The edits did not work properly to prevent BSLD service before that date for customers in the 5 states who were served out of Georgia or Louisiana. In any event this order is not evidence of a systemic problem and was caught, as were all of the other orders, as a result of BellSouth's controls.

Conclusion

While BellSouth regrets that this situation has occurred, overall, it demonstrates that BellSouth has instituted adequate controls to prevent the provision of interLATA services prior to authorization and to identify any orders that may have been accepted in error so that they can be corrected. Between October 1 and October 9, approximately 87,000 customers contacted BellSouth Small Business Customer Service centers. These 87,000 contacts resulted in only 7 inappropriate BSLD orders, approximately 0.008% of the contacts. This de minimis number clearly indicates that BellSouth's training and other controls have been effective. Similarly, Consumer (residence) Customer Service Centers received over 500,000 contacts from customers in Tennessee and Florida during this timeframe and only 18 orders were accepted in error, an error rate of 0.0036%.

BellSouth, in providing this information, does not admit that a violation of the Telecommunications Act of 1996 or any other provision has occurred. The situations addressed in this letter demonstrate that BellSouth had adequate controls in place to prevent the provision of in-region, interLATA service prior to appropriate approvals. Please contact me if you have questions.

Sincerely,



Jonathan B. Banks

cc: Hilary DeNigro
Christine Newcomb
Beth Keating
Sara Kyle
Luin Fitch
James Davis-Smith

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2002, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight
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