BellSouth Telecommunications, Inc.
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September 5, 2001

VIA HAND DELIVERY
PROPRIETARY INFORMATION ENCLOSED

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

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

Dear Mr. Waddell:

Enclosed are five paper copies and 2 CD ROMs ("Public" and "Proprietary" versions) of BellSouth's responses to the discovery filed by the various parties in this proceeding. Both the paper copies and the Proprietary CD ROM contain proprietary information that should be treated in accordance with the terms of the Proprietary Order. CD ROM copies of BellSouth's responses were sent via overnight courier yesterday to counsel of record. As noted in its responses, there are a few data requests BellSouth is still working on. Bellsouth will file responses to those requests as soon as possible.

The KMC parties did not participate in the 1997 271 case and have not confirmed that they will abide by the terms of the Protective Order. Consequently, BellSouth provided copies of its non-proprietary discovery responses to the KMC parties and agreed to provide the proprietary portions of the responses as soon as the KMC parties confirm their agreement to abide by the Protective Order.

Thank you for your attention to this matter.

Very truly yours,

Guy M. Hicks

GMH:ch

409414

REQUEST: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

RESPONSE:

Milton McElroy, Interrogatory – 29 and PODs 15, 31.
Kathy Wilson-Chu, Interrogatory – 29, and PODs 15 and 31
Ron Pate, 19-22, 26, 29, 32, 36, 38-39, 42-46, 55, 100, and PODs 14, 16, 17, 19-20, 30
Alphonso Varner, Interrogatories 16-18, 25, 28, 56, 98, PODs, 21-23, 29
Keith Milner, Interrogatories 10, 11, 24, 27, 30, 51, 83-86, 91, 94, and PODs 4-5, 8-9, 11, 18, 32
Ken Ainsworth, Interrogatories 23-24, 27, 32, 33-34, 36-39, 52-55, 42-48, and PODs 12-13, 18, 24, 32,
Eric Fogle, Interrogatories 24, 27, 34, 87, 89, 90, 92, 93, 97 99, and POD 2
Doug Schaller, Interrogatory 2
David Scollard, Interrogatories 5, 6, 14, 24-28, 35, 47-50, 57, and PODs 18, 32,
Richard McIntire, Interrogatories5-6
Tom Lohman – Interrogatory 8
Marcus Cathey – Interrogatory 41
Cathy Forbes – Interrogatory 31, POD 3
Cindy Cox – Interrogatories 15, 72-73
Dan Meeks – Interrogatory 58
Linda Kinsey – Interrogatories 3-4, 12, 99, 95, 96, POD 28
Steve Bigelow – Interrogatory 7
Chuck Blackburn – Interrogatory 9
Tommy Williams – Interrogatories 59 – 69, PODs 2, 25-27
Wayne Gray, Interrogatories 13, 70-71, 74 – 81, PODs 6-7
William Stacy – Interrogatory 40

REQUEST: Please identify the individual who is best able to provide information on the existence and extent of competition for local service in Tennessee.

RESPONSE: Doug Schaller and John Ruscilli are the two persons best able to provide information on competition in Tennessee.

REQUEST: Provide the total number of BellSouth lines for Tennessee, including switched and special access lines.

RESPONSE: Total F1 type Working Lines as reflected in LEAD/LFACS: 2,992,139
Data from luvm.sum option1 run 08/27/01

REQUEST: Provide the total number of CLEC lines for Tennessee

RESPONSE: The estimated total number of resold and facility based CLEC lines in Tennessee as of August 1, 2001 is 357,445.

REQUEST: Provide, by quarter, the total number of minutes exchanged with CLECs from 1996 to the present.

RESPONSE: Information is not available for 1996 and 1997. Please see below for 1998 to 2001.

MOUs CLEC originated BellSouth terminated

Tennessee CLEC Originated MOUs **				
	1998	1999	2000	2001
1st Qtr	44,858,251	110,188,083	192,212,435	300,266,020
2nd Qtr	61,419,222	158,363,485	238,500,915	247,996,531
3rd Qtr	85,391,376	163,875,179	234,140,306	--
4th Qtr	96,633,541	182,902,359	277,923,047	--

** The totals in this table include Local MOUs originated by CLECs and terminated to BellSouth as well as ISP MOUs originated by CLECs that are bound for the Internet through Internet Service Providers served by BellSouth.

Tennessee BellSouth Originated MOUs				
	1998	1999	2000	2001
1st Qtr	253,042,727	1,122,019,916	2,382,693,188	3,084,790,344
2nd Qtr	382,985,486	1,269,469,316	2,394,646,876	2,929,073,321
3rd Qtr	571,510,142	1,731,384,288	2,511,952,286	--
4th Qtr	802,315,501	1,871,491,764	2,802,739,841	--

REQUEST: For each of the past five years, provide the number of minutes interchanged between BellSouth and CMRS networks in Tennessee. Separately identify:

A. The number of minutes originating with CMRS customers and terminating with BellSouth.
B. The number of minutes originating with BellSouth and terminating on CMRS networks.

RESPONSE The total number of minutes exchanged with CMRS originating from BellSouth is not available for 1996, 1997 and 1998. Please see below for 1999 to the present:

A. MOUs CMRS originated BellSouth terminated

1999	1,192,318,910
2000	1,890,379,605
2001 thru July	1,595,096,829

B. MOUs BellSouth originated CMRS terminated

1999	461,433,798
2000	1,111,005,421
2001 thru July	721,167,434

REQUEST: Provide for each of the last five years, the total number of BellSouth's Tennessee:

A. Local minutes
B. Local calls
C. IntraLATA toll minutes
D. IntraLATA toll calls
E. InterLATA access minutes
F. InterLATA access calls

RESPONSE: For b, d and f, BellSouth does not track local, intraLATA or interLATA messages as a routine part of the management of the business.

For a, c and e, see below.

	1996	1997	1998	1999	2000	2001
1st Qtr	425,486			449,794	456,334	472,434
	499,783			542,545		
2nd Qtr	434,714		465,794	475,249	494,083	467,716
	539,541					
3rd Qtr	455,004		469,127	476,177	551,088	517,649
4th Qtr	457,428		477,155	464,180	486,531	506,680

REQUEST: Provide the annual revenue received by BellSouth in Tennessee for each of the past five years:

A. For the lease of unbundled network elements; and

B. For the provision of resold services.

RESPONSE: Please see the regulated revenues in the table below:

Year	UNE	Resold Services
1996	N/A	N/A
1997	$1,003,877	$ 2,623,604
1998	$7,293,187	$10,704,225
1999	$13,021,160	$19,074,999
2000	$19,364,353	$24,571,193

REQUEST: For the most recent six-month period, please provide BellSouth's monthly wholesale revenues on a Tennessee-specific and regional basis, for each of the following:

A. Residential resale;
B. Business resale;
C. Unbundled network elements; and
D. Interconnection

RESPONSE:

Tennessee

$000	Feb 01	Mar 01	Apr 01	May 01	Jun 01	Jul 01
Residential Resale	$ 871	$ 882	$ 878	$ 860	$ 831	$ 827
Business Resale	$ 1,308	$ 1,287	$ 1,233	$ 1,224	$ 1,257	$ 1,324
Total UNE	$ 3,111	$ 3,451	$ 10,014	$ 12,849	$ 4,066	$ 3,793
Local Interconnection	$ 191	$ 162	$ 4,646	$ 148	$ 184	$ 154

Total UNE Revenues based on product codes that begin with a 6. This includes revenues associated with Loops, Combos, Local Interconnection, etc.

REQUEST: Provide the number of interconnection trunks between BellSouth and CLECs in Tennessee separately identified between:

A. One way trunks delivering CLEC originated traffic to BellSouth;
B. One way trunks delivering BellSouth originated traffic to CLECs;
C. Two way trunks between BellSouth and CLECs; and
D. Any other type of interconnection trunk, with a brief description explaining its function.

RESPONSE:

		Trunks In Service (July 2001)	
Category	**Type Trunks**	**Total BellSouth**	**Tennessee**
Interconnection	1 Way: BLS to CLEC	779,474	102,666
	1 Way: CLEC to BLS	190,666	19,906
	2 Way	237,859	20,736
Operator Services	Directory Assistance	3,022	411
	Toll and Assistance	3,117	449
	Verification	522	57
Emergency Services	911/E911	5,035	528
Intercept Services	Intercept	166	16
Total		1,219,861	144,769

REQUEST: From the time period November 1, 2000 to the present, please describe:

1. How many separate times BellSouth disconnected interconnection trunks in Tennessee and each of the other states in BellSouth's region. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
2. In what specific locations did BellSouth disconnect interconnection trunks in Tennessee and each of the other states in BellSouth's region;
3. In the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur; and
4. In how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?

RESPONSE: Please see the attached table.

Note: Based on sections 3 and 4 above, this response is assumed to apply only to AT&T and AT&T companies.

BellSouth Managed Trunks for AT&T Companies
Disconnected from November 2000 to June 2001

State	Activity	Reason for Disc	TGSN	Trunk Type	LocA	LocZ	CCNA	Trunks in Service After Change	Trunk Change	Date of Notice to AT&T	Complete Date	No. Days from Notice to Disc	Did BLS wait for response?	Date of Response from AT&T
AL	None													
GA		Disc	Underutilization	AC202859	AF4-TDJKE	ATLNGAEP01T	ATLNGAEP1MD	AXX	840	-480	10/9/2000	11/03/2000	25	Yes	10/13/2000
	1-for-1 Repl	Disc	End Ofc Repl	AC203819	PH5-EDJ	ASTLGAMA94F	ATLNGAEP1MD	AXX	0	-168	Note 2	12/02/2000	Note 2	Yes	Note 2
		Add		AC216056	PH5-EDJ	ASTLGAMADS1	ATLNGAEP1MD	AXX	168	+168		12/02/2000			
		Disc	64 Clear Channel Conv	AC216056	PH5-EDJ	ASTLGAMADS1	ATLNGAEP1MD	AXX	0	-168		03/31/2001			
		Add		AC224704	PH5-EDJKE	ASTLGAMADS1	ATLNGAEP1MD	AXX	168	+168		03/31/2001			
		Disc	End Ofc Repl	AC204723	PH5-EDJ	RVDLGAMA99A	ATLNGAEP1MD	AXX	0	-96		05/05/2001			
		Add		AC217746	PH5-EDJ	RVDLGAMADS1	ATLNGAEP1MD	AXX	96	+96		05/05/2001			
		Disc	End Ofc Repl	AC211541	PH5-EDJ	RVDLGAMA99A	NRCRGAMA4MD	TPM	0	-24		05/05/2001			
		Add		AC217756	PH5-EDJ	RVDLGAMADS1	NRCRGAMA4MD	TPM	24	+24		05/05/2001			
		Disc	64 Clear Channel Conv	AC217746	PH5-EDJ	RVDLGAMADS1	ATLNGAEP1MD	AXX	0	-96		06/09/2001			
		Add		AC228122	PH5-EDJKE	RVDLGAMADS1	ATLNGAEP1MD	AXX	96	+96		06/09/2001			
		Disc	End Ofc Tndm Rehome	AC196083	AF3-TDJKE	ATLNGABU01T	ATLNGABU4MD	AXX	792	-192		05/24/2001			
		Add		AC220059	AF3-TDJKE	ATLNGABU03T	ATLNGABU4MD	AXX	216	+192		05/24/2001			
		Disc	64 Clear Channel Conv	AC212646	PH5-EDJ	MRTTGAEADS1	NRCRGAMA4MD	TPM	0	-120		06/09/2001			
		Add		AC221821	PH5-EDJKE	MRTTGAEADS1	NRCRGAMA4MD	TPM	120	+120		06/09/2001			
FL	3 Groups	See response to AT&T's 1st set of Interrogatories, Item No. 12, Florida Public Service Commission FPSC Dkt No. 960786-TL													

KY	None	See response to AT&T's 1st set of Interrogatories, Item No. 109, Kentucky Public Service Commission Case No. 2001-105

LA	None	

MS	None	

NC	3 Groups	See response to AT&T's 1st set of Interrogatories, Item No. 111, North Carolina Utilities Commission Docket No. P-55, Sub 1022

SC	Note 1	Disc	Underutilization	AC211827	AF4-TDJKE	CLMASCSN60T	CLMASCTLUMD	ATX	48	-24	10/23/2000	04/08/2001	167	Yes	March 2001
		Add							120	+72	DNA	04/12/2001	DNA	Yes	DNA

TN	1-for-1 Repl	Disc	Tandem Repl	AF152409	AF4-TGJZLKE	NSVLTNMT7GT	NSVLTN48AMD	TPM	0	-192	Note 2	6/5/2001	Note 2	Yes	Note 2
		Add		AF192566	AF4-TGJZLKE	NSVLTNMT00T	NSVLTN48AMD	TPM	192	+192		05/16/2001			

Notes:

1 This group was originally identified in 4Q2000 as underutilized and was scheduled for reduction in November 2000. Because of delays in AT&T's response agreeing to the disconnect, the due date was changed several times. Shortly before the reduction of trunks on this group, AT&T added an Internet Service Provider without prior notice to BellSouth that generated sufficient traffic to cause immediate trunk blocking. BellSouth expedited an add order which was implemented within four days of the disconnect to resolve the blocking.

2 These trunk changes are replacements, not disconnects, but processed as adds and disconnects. These groups were replaced on a one-for-one basis in connection with various network conversions. Regular conversion intervals, network notifications and inter-company dialog applied to these trunk group replacements.

* DNA – Does Not Apply

REQUEST: What is the percentage of NGDLC in BellSouth's network in Tennessee and in each of the other states in BellSouth's region?

RESPONSE: BellSouth is still investigating this response.

REQUEST: Please identify charges assessed by BellSouth to AT&T for cable under USOC PE1PM (cable) at the following Tennessee collocation site: NSVLTNDOXAX. Please identify what this recurring charge is for. If it is for power cable, please identify for each location, if the cable is feeding power from a BellSouth BDFB or directly from the power equipment.

RESPONSE: PE1PM is the USOC for cable support structure and is assessed as a recurring charge per entrance facility. It recovers the cost of the cable racks and supports in the cable vaults. In Tennessee, AT&T currently pays an amount of $13.35 per cable for the USOC PE1PM.

REQUEST: Identify precisely how each of BellSouth's charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 24 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Does BellSouth support any particular expedited dispute resolution procedure? If so, describe in detail that procedure.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 25 in Kentucky Public Service Commission Case 2001-105.

REQUEST: For the months of January 2001 through July 2001, please state, by month, the percentage of coordinated cutovers that involved IDLC in Tennessee and in each of the other states in BellSouth's region.

RESPONSE: The systems in which the requested information is retained, only retains this type of information for 60 days. Consequently, the data for January 2001 through March 2001 is not currently in BellSouth's possession, custody or control. The only responsive information that remains in BellSouth's possession is for the months of April and May 2001. BellSouth manually reviewed every order involving Coordinated Cutovers for these months in TN to identify whether IDLC was involved.

In April 2001, 12.4 % of the Coordinated Time-Specific Cutovers involved IDLC. In May 2001, 20.4% of the Coordinated Time-Specific Cutovers involved IDLC.

BellSouth is currently compiling the remaining data for coordinated cutovers that involved IDLC in each of the other states in BellSouth's region and will supply it as soon as it is complete.

REQUEST: For the months of January 2001 through July 2001, please state the number and percentage of coordinated customer conversion service orders involving IDLC in Tennessee and in each of the other states in BellSouth's region for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

RESPONSE: The systems, in which the requested information is retained, only retains this type of information for 60 days. Consequently, the data for January 2001 through March 2001 is not currently in BellSouth's possession, custody or control. The only responsive information that remains in BellSouth's possession is for the months of April and May 2001. BellSouth manually reviewed every order involving Coordinated Cutovers for these months in TN to identify whether IDLC was involved and, where IDLC was involved, the time where BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measurement.

In April 2001, none of the Time Specific Coordinated Cutovers involving IDLC failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measurement In May 2001, 5% of the Time Specific Coordinated Cutovers involving IDLC failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measurement.

In June and July, all states in BellSouth met the Coordinated Hot Cut Timeliness % Within Interval Measure.

REQUEST: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Tennessee and in each of the other states in BellSouth's region. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

RESPONSE: BellSouth produces a Service Order Accuracy Report as ordered by the GA PSC. Service Order Accuracy rates with respect to Resale Residence CLEC non-dispatched orders, < 10 circuits orders for GA beginning in March 2001 and Florida in July 2001 as reported by BellSouth are attached below:

	JAN	FEB	MAR	APR	MAY	JUNE	JULY
GA	98.11%	95.71%	97.22%	83.78%	90.53%	92.58%	87.50%
FL	N/A	N/A	N/A	N/A	N/A	N/A	95.15%
NC	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SC	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TN	N/A	N/A	N/A	N/A	N/A	N/A	N/A
KY	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LA	N/A	N/A	N/A	N/A	N/A	N/A	N/A
AL	N/A	N/A	N/A	N/A	N/A	N/A	N/A

BellSouth does not mechanically record, on a historical basis, whether the service order requests submitted by the CLECs were processed exactly as submitted or whether some changes were necessitated. The only way to ascertain the answer to this question would be to go back and find the service order request submitted by the CLEC and then compare it to the service order that was issued, which would have to be done manually, if it could be done at all for the period requested.

Beginning with September 2001data, BellSouth will publish a Regional Service Order Accuracy report.

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about or responsible for implementing the change control processes used to manage changes made to interfaces and processes used in BellSouth's retail operations.

RESPONSE: BellSouth Business Systems:
Melaine S. Hardwick
Director
3 Floor, 1277 Lenox Park Blvd
Atlanta, GA 30319

Bryan Estes
Group Leader, Accenture
Suite 500, 2835 Brandywine Rd
Atlanta, GA 30341

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the OSS functionality provided to BellSouth's retail operation in comparison to that which is provided to AT&T, including certain issues pending in the change control process, such as:

A. the provision of parsed customer service records for pre-ordering;
B. the provision of the ability to submit orders electronically for all services and elements; and
C. the provision of electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

RESPONSE: William N. Stacy
Network Vice President, Interconnection Services
4410, 675 West Peachtree Street
Atlanta, Georgia 30375

and

Ronald M. Pate
Director, Interconnection Services
3J39, 675 West Peachtree Street
Atlanta, Georgia 30375

REQUEST: Identify the members of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of change requests under the Change Control Process Document. This should include but not be limited to the groups known as the "Triage Committee", the "Change Review Board", the "Directors Committee", the "Release Prioritization Team", the "Third Party Testing Team", the "Regulatory Team" the "LCSC Team", the "Project Managers", the "BellSouth IT Team", and "BTSI".

RESPONSE: BellSouth objects to this Request as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: List and identify the purpose of all changes implemented to the BellSouth retail interfaces known as the Regional Negotiation System (RNS) and Regional Ordering System (ROS) from January 2000 to the present.

RESPONSE: BellSouth objects to this Request as overbroad and unduly burdensome. BellSouth will respond to this request from January 1, 2001 forward. Please see attachment.

ATTACHMENT ONE
(Eight Pages)

ROS Type 2
January 2001

Feature Description	Type
Number Pooling	Mandate/Regulatory

ROS Type 2
February 2001

Feature Description	Type
BLOC (Bill Block)	Mandate/Regulatory
Modify ROS Hunting Behavior	Operational Efficiency
Redefine requirements for replicating TN	Operational Efficiency
Removing multiple appearances of subsequent addrs	Operational Efficiency
Allow USOC retrieval for partial CSR	Operational Efficiency

ROS Type 2
March 2001

Feature Description	Type
BSLD Reconstruction	Revenue
Generate RTG SUBS on ERG orders	Operational Efficiency
Code DCR edits 11 and 17, remove codes	Operational Efficiency
ISDN-RTG ISDN not floating on C orders	Operational Efficiency
Correct NRPC value generation (BSLD)	Revenue
CPNI pop-up (add text to dialog box) (BSLD)	Revenue
Lengthen duration of message-status bar	Operational Efficiency
Additional RSAG info for Quick Service	Operational Efficiency

ROS Type 2
April 2001

Feature Description	Type
Operating System upgrade	Technical upgrade
	Type 3 release

ROS Type 2
May 2001

Feature Description	Type
Recap due to PKG FID	Operational Efficiency
Auto-populate Billing FIDs for the BAC	Mandate/Regulatory
Frame Relay-Add new folder ISA Link/ISA CIR	Operational Efficiency
Display dialog box on D-order when TN is not main acct #	Operational Efficiency
Additions & Changes for the BSLD folders	Revenue
Add missing Trunk Class of Svc USOC for North Carolina	Revenue
Add Workflow for Frame Relay	Operational Efficiency
Frame Relay-New widget CIRX, DLCI & RCID	Operational Efficiency
Exclusions for LNP Cost Recovery (Part A&B)	Mandate/Regulatory
Hunt Types for C.O.	Operational Efficiency
GUI: Remarks Text Box, make ready to type in when open folder	Operational Efficiency
Don't Auto Validate a Pdng ord when retrieved	Operational Efficiency
Delete Incorrect Svc Codes for LNP	Operational Efficiency
Add Paymt Options folder to Frame window	Operational Efficiency
Chng UR 69.5 to use current date for HN orders	Operational Efficiency
Make S&E DLCI 007 edit severe	Operational Efficiency
SOC window maximize after pndg orders issued	Operational Efficiency

ROS Type 2
June 2001

Feature Description	Type
Frame - Add CRXNX to Att. 105.1	Operational Efficiency
Make FMT edit 0450 severe (MegaLink)	Operational Efficiency
CENT edit 009 to fire at issue	Operational Efficiency
New Paging feature	Revenue
Infer 8SCRB USOC for KY only	Operational Efficiency
Change FMT edit 005 to severe	Operational Efficiency
Change FMT edit 579 to severe	Operational Efficiency

ROS Type 2
July 2001

Feature Description	Type
Primary Rate ISDN	Operational Efficiency (Type 3)

ROS Type 2
August 2001

Feature Description	Type
Allow Service Address Key on T orders	Revenue
Add additional site code on create order	Operational Efficiency
Don't populate Driving inst from RSAG	Operational Efficiency
Delete regionwide pager plans	Revenue
Add PGRVE to paging plan folder for Variable Rate Billing	Revenue
Paging - PGRZA &PGRZB USOCs	Revenue
Retrieve partial CSR by FID	Operational Efficiency
Display message heading text without opening message	Operational Efficiency
Allow Search & Replace by left-handed FID	Operational Efficiency
Modify CENT logic when BTN or ZAEN is present	Revenue
Additional TAC FIDs for BSLD	Revenue
Autopopulate customer name to DDA	Operational Efficiency
Add Century FL area code to AL	Operational Efficiency
Correct UR 53.24	Operational Efficiency
Display site code data, easy to read	Operational Efficiency
Display dialog box on D&F orders when UN9 present	Operational Efficiency

ATTACHMENT TWO
(Two Pages)

Feature Name	Description/Purpose	Release
Thousand K Block Number Pooling	Legal Directive - Compliance with Florida Number Pooling Mandate	2001.1
Thousand K Block Number Pooling - Matrix Support	Legal Directive - Compliance with the Florida Number Pooling Mandate	2001.1
NPA_RNS Support for Tennessee NPA Split 'no scenarios	To ensure correct telephone number assignment in the NPA split area for GA. This will prevent service order errors once the OSS system converts	2001.1
Internet Call Waiting 1A Switches	Work will generate revenue for BellSouth, provide net present value of the financial impact to BellSouth if this work is implemented.	2001.2
Complete Choice Multiline Metro Discount	To add functionality to RNS to accommodated rates reductions that are in direct response to competion for local services in these metro areas.	2001.2
Internet Call Waiting 1A Switches - Matrix Support	To Allow RNS to format the correct system codes for new USOCs	2001.2
Internet Call Waiting 1A Switches - Due Date Support	To provide due date support for new USOCs	2001.2
MS Area Plus Complete Choice LATAwide OCP Restriction	To support SOER edits for mutual exclusivity of LATAwide APPCC and with OCPs that cover the same geographical area	2001.2
MPO - MPO Phase II - ZMPO	Will allow CID letters to be mailed to existing MPO customers who order a BSS wireless plan.	2001.2
Installment Billing Service Fee		2001.2
Credit Card Enhancements (CCA)	Provide improved processing and reduced contact time.	2001.2
Notations - Credit Card Enhancements	Provide clear and concise memo notations for Credit Card Application	2001.2
Paging - Two Way Paging & Colored Pagers	Add new Pager, T-900 to Paging window.	2001.2
Paging - Two Way Paging & Colored Pagers Matrix Support	To allow RNS to format the correct system codes for the new USOCs	2001.2
2001 Consumer Promotion	From 3/ 1 - 4/ 30, customers who are new subscribers to a select group of products will receive a coupon redeemable for cash back	2001.2
NPA_RNS Support for Louisiana NPA Split	To ensure correct telephone number assignment in the NPA split area for LA. This will prevent service order errors once the OSS system converts	2001.2
VRS Billing Inc. - Name Change	Change carrier name from VRS Billing System to eBillit.	2001.2
NPA_RNS Support for Louisiana NPA Split	To ensure correct telephone number assignment in the NPA split area for LA. This will prevent service order errors once the OSS system converts	2001.2
NPA_RNS Support for Florida NPA Split	To ensure correct telephone number FL. This will prevent service order errors once the OSS system converts	2001.2
Paging - Two Way Paging & Colored Pagers Due Date Support	To provide due date support for the new USOCs	2001.2
Pseudo - Two Way Paging & Spanish Pager Option		2001.2
BSLD - Regulated Category 42 Adjustments	To ensure that RNS displays the correct adjustment reason for Category 42 charges.	2001.3
LOS with Complete Choice - LA	To allow correct rating of products when LOS is a Complete Choice Class of Service	2001.3
LOS with Complete Choice Due Date Support	Due Date Support for LOS with Complete Choice	2001.3

BSLD Marketing and Sales Compliance	Changes CPNS pop-up screen now to indicate that other carriers' proprietary info may not be used for any BellSouth marketing purpose, even w/end-user's appro	2001.3
LS350 Pager in Solutions Package	Reintroduce LS350 as Solutions Package	2001.3
Privacy Director with Complete Choice Monthly Rate	Need to change the recurring monthly rate for Privacy Director with Complete Choice from $.01 to $1.95. in specific states.	2001.3
Reverse Translate Tracking	Provides by a means by which reverse translate errors can be tracked	2001.4
CBR on Dispatchable C Orders	To allow for CBR to be formatted on dispatchable C orders	2001.4
Winback UNE Port Loop Combo	To expand the existing reseller switchback functionality in RNS to support switchback of end users from CLECs providing local service vis the UNE Port	2001.4
P25 H25 Change Start dates (FUEL Only - No TS)	This change will prevent customer irritation, service order errors and possible PSC penalties	2001.4
NPA_RNS support for Florida 'no scenarios	Mandated NPA Split/Realignment for FL	2001.4
NPA_RNS support for Alabama 'no scenarios	Mandated NPA Split for AL	2001.4
NPA_RNS support for Georgia Overlay	Mandated NPA Overlay for GA	2001.4
NPA OLY Georgia 770/678/470 Overlay Summary Messages	Messages to advise customer of mandatory 10 digit dialing in this area	2001.4
NPA_RNS support for Florida 'no scenarios	Mandated NPA Split/Realignment for FL	2001.4
NPA_RNS support for Alabama 'no scenarios	[Mandated NPA Split for AL]: REASON	2001.4
NPA_Overlay Support Georgia- Restoral, Legal & Security	Mandated NPA OVERLAY in GEORGIA	2001.4
NPA OLY Georgia 770/678/470 Overlay Summary Messages	Messages to advise customer of mandatory 10 digit dialing in this area	2001.4
Recurring Credit Card FID ZRCC - Recognize in Fuel only	To allow accounts with theFID ZRCC in the Bill Section into RNS	2001.4
Support for Directory Listed Address	Will allow override fo the optional city field on the Simple Listings Window	2001.6
Number Pooling - Phase 1.5	Change the criteria around recognizing the FID INVU and RTNN with the code set of NP.	2001.6
Support for Directory Listed Address	Will allow override fo the optional city field on the Simple Listings Window	2001.6
BSLD - BS Global Calling Cards	To allow calling card promotions with BSLD	2001.6
Wireless Solutions - Convergent Billing	Will correct design gaps associated with converged billing of landline and wireless accounts. Correcting the design would 1) reduce discrepancies of BellSouth Solutions customers marked incorrectly as non-Solutions customers; 2) eliminate the manual correction of hundreds of accounts monthly; and 3) increase customer satisfaction and decrease customer callbacks.	2001.6
Late Payment Charge Enhancements	This change will allow for the (LPC) to be quoted when appropriate on collections contacts. Will also allow correct adjustments.	2001.6
CPE English changes & other items	To correct English language associated with CPE items.	2001.6

REQUEST: Provide LCSC employee monthly turn-over (retention) rates from January 2000 to the present.

RESPONSE: BellSouth objects to this Request on the grounds that it is not relevant and that it is not reasonably calculated to lead to the discovery of admissible evidence.

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REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both. Such internal measures may include, but are not limited to, those external measures contained in BellSouth's Service Quality Measurement Plan that was ordered by the Georgia Public Service Commission.

RESPONSE: BellSouth objects to this Request on the grounds that it is overbroad, unduly burdensome, not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Please identify each BellSouth SQM measure upon which BellSouth relies in Tennessee that differs from the comparable SQM measure approved by the Georgia Commission, and for each, describe the nature of the difference.

RESPONSE: On July 30, 2001, BellSouth filed an interim SQM to be used in this docket. It was Exhibit DAC-1 to the Direct Testimony of David Coon. The BellSouth SQM measures upon which BellSouth relies in Tennessee do not differ from the comparable SQM measures for Georgia.

REQUEST: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance and repair and billing) to CLEC service requests (e.g. resale, unbundled network elements, or interconnection for customers in Georgia or Florida as compared to similar orders for CLEC customers in other states in the BellSouth region, such as Tennessee? If so, please:

A. describe such policies or practices;
B. state the purpose of such policies and practices; and
C. identify the person within BellSouth who was responsible for instituting such policies and practices.

RESPONSE: BellSouth is still investigating this response.

REQUEST: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both. The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center; (c) regional central office operations; (d) regional installation and maintenance operations; (e) regional engineering and construction operations; (f) work management centers; (g) network reliability center; (h) address/facility inventory group; (i) circuit provisioning group; (j) customer wholesale interconnection services (CWINS) center; (k) billing data centers.

RESPONSE: BellSouth objects to this Request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence

REQUEST: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

RESPONSE: BellSouth objects to this Request as overbroad, unduly burdensome, not relevant, and not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Please state the amounts that BellSouth has paid Pricewaterhouse Cooper for:

A. Its two regionality reports; and
B. Any financial audit services since January 2000.

RESPONSE: BellSouth objects to this Request on the grounds that it is not relevant and that it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Describe the process by which BellSouth updates the following databases to reflect services ordered by a CLEC: (1) the Line Identification Database or LIDB; (2) the directory assistance database (i.e., the database accessed by BellSouth's directory assistance personnel); and (3) the 911 database (i.e., the database accessed by 911 personnel).

RESPONSE: 1) Facility-based CLECs fax or email Line Information Database System ("LIDB") updates directly to the administration center. These updates are real-time entered into the LIDB database and become active as soon as the entry is completed. If personal identification numbers ("PINs") are required, these are also provided by the CLEC and included in the update. For UNE-P/resale CLEC customers, the BellSouth Service Order Communication System ("SOCS") releases the Disconnect ("D") and New ("N") orders to the Database Administration System ("DBAS") as soon as the orders are identified as "correct and complete". All orders batched to DBAS prior to 5:00 PM CST are updated in LIDB that day. Orders received in DBAS after 5:00 PM CST (Monday-Saturday) are accumulated and batched for updating in LIDB the following day. An exception to this process occurs if a new calling card is requested on the N order. This requires SOCS to deliver the service order to Customer Record Input System ("CRIS") to generate a PIN that is required in LIDB. CRIS would then batch to DBAS and the service order would follow the same process as described above. This service order process is identical for BellSouth retail local exchange customers.

2) Both facility-based and UNE-P/resale CLEC service orders, based on Local Service Requests ("LSRs"), are entered by an automated process into SOCS. Completed service orders are passed to the Listing Information System ("LIST"). LIST edits the order and upon validation, LIST passes real time listing information to the Directory One ("D1") Database System daily until 8:00 PM local time. D1 is the database that stores listings for use by BellSouth's Directory Assistance personnel. D1 is updated six nights a week (Monday – Saturday). This process is completely automated and is the same

process used for BellSouth and Independent Company subscriber listings.

3) When a facility-based CLEC interconnects to BellSouth's network for 911 service, the CLEC is responsible for getting its end user customer information into the BellSouth 911 database and keeping it updated. BellSouth does not have access to the CLEC's customer information and therefore has no way of getting the CLEC customer information into the 911 database. The 911 database contains pertinent customer information (i.e. customer name, address, phone number, and service provider) that is necessary to route the 911 call to the appropriate Public Safety Answering Point ("PSAP"). In order to do this, each Facility Based CLEC is provided with an E911 Local Exchange Carrier Guide ("The Guide") that gives the CLEC the information necessary to submit its customer data for input in the 911 database. The 911 database is maintained by Intrado on BellSouth's behalf. The CLEC needs to establish an electronic interface with Intrado in order to send service orders updating its customer records and to maintain the accuracy of the 911 database. This responsibility is specifically addressed in The Guide. A reseller of BellSouth's local retail service or a UNE-P customer is treated the same as a BellSouth customer in the case of the 911 database. LSRs are entered into SOCS and are processed through BellSouth's normal service order flow. Completed service orders received by 6:00 PM local time are sent to 911 in a nightly file to Intrado (Sunday-Friday). This file contains BellSouth records as well as reseller and UNE-P customer records.

REQUEST: For the period reported in each Form 477 filed with the FCC, identify the number of unbundled loops by:

A. Analog loops
B. DS-1 unbundled loop
C. DS-3 unbundled loops

RESPONSE: See attachment to 1st Production of Documents Item 3

REQUEST: Please describe in detail the process BellSouth uses to migrate a customer from BellSouth to a CLEC when the CLEC is reselling BellSouth's residential service. Please include in your description an explanation of all internal BellSouth orders (such as "D" orders and "N" orders) used to facilitate the migration and the provisioning systems those orders flow through.

RESPONSE: CLECs may submit a Retail to Resale conversion as either Activity Type ("V") "as specified" or Activity Type ("W") "conversion as is" electronically via Local Exchange Navigation System ("LENS"), Electronic Data Interchange ("EDI"), Telecommunications Access Gateway ("TAG"), or RoboTAG™. Or from the receipt of a clean and accurate manual LSR, BellSouth's LCSC will enter the request into DOE/SONGS. A single "C" order is issued, which changes the responsible party (customer of record) for the Retail service from the BellSouth customer to the CLEC. Any change to the service, requested by the CLEC, is also performed as a result of the "C" order. The "C" order is sent to Service Order Communications System ("SOCS") to flow to LFACS to update records. The "C" order completes on the due date and flows to CRIS for billing and updates the Customer Service Record ("CSR").

Business rules for electronically/manually submitting Local Service Requests of this type are located on the BellSouth Interconnection Web Site, BellSouth Business Rules for Local Ordering, Section 6.3. http://www.interconnection.bellsouth.com/guides/html/leo.html

REQUEST: BellSouth has stated that of 141 cases of lost dial tone presented to it by MCI from its Georgia launch, BellSouth has identified 11 cases where dial tone was lost because of BellSouth's two order provisioning process, when the "D" and "N' orders became disassociated. With respect to these eleven cases, please:

(a) Identify the LSR or PON involved;
(b) Provide the customer telephone number involved;
(c) Describe in detail why the D order and the N order were not associated;
(d) State the reason reported to MCI for loss of dial tone;
(e) State the internal BellSouth disposition and cause codes that were used for these incidents; and
(f) State how these eleven incidents were reflected in the BellSouth metrics of customers who lost dial tone within ten days of installation.

RESPONSE: Based on the previous CWINS analysis of the 11 orders, two of the reports were on the same number leaving 10 orders in question. All of these orders had conversion related problems but not necessarily due to the D and N order process. Six of the orders had problems associated with translation type issues. Two of the orders were related to incorrectly written service orders. Only two of the orders were related to the D and N order process with the N order having a due date after the D order. The attached spreadsheet (TNInt33.xls) summarizes the investigation into these problems and provides the requested data for (a), (b), (d) and (e) above. The remainder of the requested data, (c) and (f), will be provided here. BellSouth has never stated that these 11 cases were related to the D and N order process, only that they could be attributed to the conversion.

(c) 770-619-4002 was one of the numbers that had a trouble due to the D and N order process. The due date on the N order was four days after the due date on the D order.

404-767-2774 was the other number that had a trouble due to the D and N order process. The orders were issued correctly initially but

when a supplement was received to change the due date, the N order due date was changed but the D order due date was not.

(f) Seven of these trouble reports would have been counted as troubles within 10 days of installation. Four of them would not have been since they were not reported to BellSouth by MCI within 10 days of the conversion. (See spreadsheet for migration dates and trouble reported dates.)

ATTACHMENT ONE
(One Page)

(b) TELEPHONE NUMBER	(a) PON	D ORDER #	N ORDER #	ELECT./MAN. ISSUED	MIGRATION COMPLETE	TROUBLE REPORTED	TROUBLE CLOSED	REPORTED TROUBLE	(d) REASON REPORTED TO MCI FOR LOSS OF DIAL TONE	(e) DISPOSITION AND CAUSE CODE
678-547-0283	S002908711BSGAPR	DO215387	NO224GN4	ELECT.	5/15/2001	6/4/2001	6/4/2001	CAN'T RECEIVE CALLS	TRANSLATION ERROR	520-300
678-479-3136	S002980889BSGAPR	NA	NO7B6RV9	ELECT.	5/19/2001	6/5/-1	6/6/2001	NDT	TRANSLATION ERROR	407-300
770-214-1528 DUPLICATE NUMBER-REPORTED TWICE	SOO3137446BSGAPR	DPMMK840	NP4CLJ59	MAN	6/7/2001	6/12/2001	6/14/2001	CAN'T CALL OUT	TRANSLATION ERROR	000-000
770-619-4002	S003258553BSGAPR	DO9J0C40	NO9JY566	ELECT.	6/19/2001	6/19/2001	6/20/2001	NDT	N ORDER DUE 4 DAYS AFTER D ORDER	510-500
404-767-2774	S003062913BSGAPR	DOCKBG80	NOCC6WD2	MAN	D=5/30/01 N=6/06/01	6/22/2001	6/23/2001	NDT	N ORDER AND D ORDER HAD DIFFERENT DUE DATES	100-400
678-344-0197	S003135584BSGAPR	DO9QXPW7	NO9V7CT0	ELECT.	6/13/2001	6/12/2001	6/12/2001	CAN'T RECEIVE CALLS	INCORRECT SERVICE ORDER	1211-600
678-924-0198	S003181557BSGAPR	DOBYHD61	NOC0WLY1	ELECT.	6/12/2001	6/13/2001	6/14/2001	NDT	INCORRECT SERVICE ORDER	1093-500
770-788-0809	S002912501BSGAPR	DP1H48L6	NP1J4N13	ELECT.	5/15/2001	6/19/2001	6/20/2001	CAN'T BE CALLED	INCORRECT ROUTING	527-100
770-788-1524	S003223576BSGAPR	DPBDKL62	NPBDTQX6	ELECT.	6/19/2001	6/19/2001	6/20/2001	NDT	INCORRECT ROUTING	527-100
770-323-2123	S003230039BSGAPR	DOL27458	NO00PD61	MAN	6/15/2001	6/18/2001	6/19/2001	NDT	IMPROPERLY INTERCEPTED	581-600

REQUEST: At what point in the migration cycle is the BellSouth retail organization informed that a residential customer has (or is in the process of) migrating to a CLEC? How is that notification made? For example, does the BellSouth retail organization receive a line loss report similar to the report that CLECs receive when a customer migrates back to BellSouth or to another CLEC? How is the notification to the BellSouth retail organization triggered? Is it triggered by the FOC, the SOC, when the billing has been changed or based on some other transaction?

RESPONSE: BellSouth is still investigating this response.

REQUEST: Please provide the complete history of the following 10 MCI accounts, including whether they ever fell into a hold file, whether they are in a hold file, whether these customers have migrated to another carrier, and, if so, the identity of the carrier to which the customer migrated.

	No CSR for MCI	**Order #**	**PONS**
1.	4042413169	N01RFMF5	S003198527BSGAPR
2.	4043490504	N05PTVQ5	S003206215BSGAPR
3.	4043492056	NOFYGRN2	S003219991BSGAPR
4.	4043700252	N0F6WKN2	S003216955BSGAPR
5.	4047581258	N0CTQHT4	S003203120BSGAPR
6.	4047613326	N0D2QHC6	S003214537BSGAPR
7.	4047920664	N00M2DB9	S003195972BSGAPR
8.	4047942712	N02PFVB9	S003214183BSGAPR
9.	6785130298	NP654FY7	S003201811BSGAPR
10.	6785602452	N)43RHY3	S003216238BSGAPR

RESPONSE: BellSouth objects to providing the identity of the carrier to which a customer migrated on the grounds that this is confidential customer information.

There is no way to get the history on the service orders once posted complete. However, based on the dates the order posted to a CSR, it is highly unlikely that any of these orders went into Hold File. They all carry the normal post time for a CSR.

1. S003198527BSGAPR received 06-11-01 posted to the CSR on 06-13.01 Migrated to another carrier on 06-29-01.

2. S003206215BSGAPR received 06-12-01 posted to the CSR on 06-14 Migrated to another carrier on 06-28-01.

3. S003219991BSGAPR received 06-13-01 order was canceled.

4. S003216955BSGAPR received 06-12-01 posted to the CSR on 06-14-01 Migrated to another carrier on 06-22-01.

5. S003203120BSGAPR received 06-15-01 posted to the CSR on 06-22-01 Migrated to another carrier on 06-26-01.

6. S003214537BSGAPR received 06-12-01 posted to the CSR on 06-14-01 Migrated to another carrier on 07-06-01.

7. S003195972BSGAPR received 06-11-01 posted to the CSR on 06-13-01.

8. S003214183BSGAPR received 06-12-01 posted to the CSR on 06-14-01. Migrated to another carrier on 06-28-01

9. S003201811BSGAPR received 06-12-01 posted to the CSR on 06-14-01 Migrated to another carrier on 06-28-01

10. S003216238BSGAPR received 06-12-01 posted to the CSR on 06-14-01 Migrated to another carrier on 06-15-01.

REQUEST: BellSouth states that the majority of MCI LSRs did not flow through because they had special pricing plans or were partial migrations. Of the total that did not flow through:

A. How many did not flow through because of special pricing plans?
B. What were the special pricing plans involved? Please list them specifically.
C. How many LSRs did not flow through because they represented a partial migration?

RESPONSE: BellSouth objects to the statement in this Request that provides that "BellSouth states that the majority of MCI LSRs did not flow through…" without reference to location of or documentation of such statement. Subject to and without waiving this objection, BellSouth will respond to subsections (A),(B) and (C) from May 1, 2001, forward.

BellSouth is not aware of any statement regarding the assumption that the majority of MCI LSRs did not flow through because they had special pricing plans or were partial migrations.

BellSouth response includes data from May through July 2001. One PON fell out for special pricing plan in May 2001 and one in June 2001 due to MCI using the incorrect (TOS) Type of Service for this type of multi-line business account. The special pricing plan on both was "Toll Discount Flex Plan, Monthly Usage, Business, 24 month", TDF24 is the USOC.

Three PONS fell out for Partial Migration in the June and July 2001 due to CLEC error

See the attachment for the PON numbers associated.

ATTACHMENT ONE
(Two Pages)

REQUEST: BellSouth has stated that manual work is required to migrate a customer as specified with the retail Complete Choice pricing plan to a CLEC. Please explain what work is performed and how this work differs from the automated processes used to migrate a customer as specified to a CLEC when the customer does not have this special pricing plan.

RESPONSE: BellSouth objects to the statement in this Request that provides that "BellSouth has stated that manual work is required…" without reference to location of or documentation of such statement. Subject to and without waiving this objection, BellSouth will respond.

The manual process for converting this type of service would depend on what is requested by the CLEC. If converting to Resale, a single C order would be issued for the conversion order. If converting to UNE-P, a "D" and "N" order would be issued. The Complete Choice would be deleted with the "D" order and the UNE-P service would be active with the "N" order.
ON a conversion from Complete Choice to Complete Choice from retail to resale the service rep would need to monitor the package currently on the CSR with what is being ordered. Removing or adding features could effect the Complete Choice package plan.

REQUEST: Please provide the reasons for the MCI-caused rejects during a week of July 2001, representing 95% of all errors on MCI LSRs.

RESPONSE: BellSouth objects to this Request on the grounds that BellSouth provides CLECs with explanations of CLEC-errors and thus MCI already has this information.

REQUEST: Please provide the reasons that other orders did not flow through and the number of orders in each category that did not flow through.

RESPONSE: BellSouth objects to this Request on the grounds that it is vague.

REQUEST: What percentage of BellSouth retail customers lose dial tone when a record change is made to their account? What percent of BellSouth retail customers lose dial tone when a feature is added?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 12 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Does BellSouth have internal criteria that it uses to evaluate its account teams? Please specify such criteria in detail.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 11 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Please describe in detail the process BellSouth uses to migrate a customer from BellSouth to a CLEC when the CLEC requests the migration "as specified" in an order for UNE-P service. Please include in your description an explanation of all internal BellSouth orders (such as "D" orders and "N" orders) used to facilitate the migration and the provisioning systems those orders flow through.

RESPONSE: For a manually submitted LSR received by BellSouth's LCSC error free, the representative enters the request into DOE/SONGS. Or CLECs may submit Retail to UNE-P conversion Local Service Requests ("LSR") "as specified" requests electronically via BellSouth's Local Exchange Navigation System ("LENS"), Electronic Data Interchange ("EDI"), Telecommunications Access Gateway ("TAG") or RoboTAG™.

Certain USOCs used to provide BellSouth Retail and Resale services are not transferable or applicable to a UNE Port/Loop Switched Combination. Those USOCs should not be included in the conversion request. There are other services that are also not applicable for conversions that if ordered will result in a clarification back to the CLEC. A list of USOCs and services that are not applicable to UNE-P can be found in the "2 wire Voice Grade UNE Loop/Port Switched Combinations (Business, Residence, and Line Side PBX" at: www.interconnection.bellsouth.com/products/html/unes.html
Upon receipt of a complete and correct LSR from the CLEC, the ordering process will proceed. A "D" order is issued to disconnect the Retail service from a BellSouth account. An "N" order issued to change the basic class of service from flat-rate to measured and establishes UNE-P service for the CLEC.

To ensure the conversion is transparent to the CLEC's End User and to ensure that there is no interruption of service, the Reuse Related Service Order ("RRSO") Field Identifier ("FID") is placed on both the "D" and "N" orders. "RRSO" denotes that facilities will be reused. Also, the Sequence FID ("SEQ") is placed in the Unfielded

Identification section of the "N" order to denote the sequence in which the orders should be processed. The orders then flow to the Loop Facility Assignment System (LFACS) to update the facility information. The orders then flow to the BellSouth SWITCH where a line class code change occurs necessary to change the service from "flat rate" to "measured" and flows to the BellSouth switch for a translation change on the due date. The order completes on the due date and flows to the Customer Record Information System (CRIS) for billing local usage.

Business rules for ordering UNE-Ps electronically/manually are located on the BellSouth Interconnection Web Site, BellSouth Business Rules for Local Ordering, Section 10.2.
http://www.interconnection.bellsouth.com/guides/html/leo.html

REQUEST: If BellSouth issues multiple internal orders to migrate a customer as specified from BellSouth to the CLEC providing UNE-P service to customers, please specify the process used to keep these orders together (or, in other words, related) as they flow through BellSouth's provisioning systems.

RESPONSE: The response in Item No. 42 explains such process.

REQUEST: Has BellSouth experienced problems keeping multiple internal orders related so they are executed in the proper sequence? What is the customer impact when such orders are executed out of sequence?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 3 in Kentucky Public Service Commission Case 2001-105.

REQUEST: When BellSouth provisions a CLEC UNE-P order, and the order is for a migration as specified, what physical work does BellSouth perform to migrate the customer? Please include a description of all work done at any point in the process, including work done at the main distribution frame or in the BellSouth port translation systems.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 4 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Under what circumstances would BellSouth need to dispatch a technician to the customer's premise to provision a CLEC UNE-P order when the order is for a migration as specified?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 5 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Once BellSouth has provisioned service for a CLEC's UNE-P customer, what steps does BellSouth take to change the customer's customer service record ("CSR") to reflect the customer's migration to the CLEC? Please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change. Are there any additional steps BellSouth takes to change its billing systems to reflect the customer migration? If so, please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 6 in Kentucky Public Service Commission Case 2001-105.

REQUEST: As of what date does BellSouth begin to bill wholesale charges to a CLEC providing UNE-P service to a customer? For instance, does BellSouth begin to bill wholesale charges as of the date service is provisioned, as of the date the customer's CSR is changed, or as of some other date?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 7 in Kentucky Public Service Commission Case 2001-105.

REQUEST: As of what date does BellSouth begin to provide daily usage information to a CLEC providing UNE-P service to a customer? For instance, does BellSouth begin to provide customer usage data covering the period beginning the date service is provisioned, covering the period beginning when the customer's CSR is changed, or covering the period beginning some other date?

RESPONE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 8 in Kentucky Public Service Commission Case 2001-105.

REQUEST: As of what date does BellSouth cease its retail billing for customers that are being migrated to a CLEC when the CLEC is providing UNE-P service to the customer and the customer is migrated as specified?

RESPONE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 9 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Once BellSouth has provisioned service for a CLEC's UNE-P customer, what steps does BellSouth take to change its line information database ("LIDB") to reflect the change in service provider? Please describe in detail those steps, approximately how long each step takes, and the systems and internal orders used to make the change.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 13 in Kentucky Public Service Commission Case 2001-105.

REQUEST: BellSouth has two USOCs for the UNE-P switch port – one with caller ID and one without caller ID. What is the purpose of these two USOCs? If a customer without caller ID wants to add caller ID at migration, must BellSouth change the port the customer was using? If so, how is that accomplished?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 14 in Kentucky Public Service Commission Case 2001-105.

REQUEST: If an electronic UNE-P migration LSR as specified falls out for manual processing, how many orders does the BellSouth service representative enter? Are these orders typed separately or are they electronically "cloned?"

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 15 in Kentucky Public Service Commission Case 2001-105.

REQUEST: If an electronic UNE-P migration LSR as specified falls out for manual processing, does the BellSouth service representative use the service address provided on the CLEC LSR to create the "D" and the "N" order? If not, from what database or system does the representative obtain the service address for the "D" order and for the "N" order?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 16 in Kentucky Public Service Commission Case 2001-105.

REQUEST: How is the LMOS database updated to reflect migration of a BellSouth retail customer to a CLEC serving the customer via UNE-P? If the "N" order falls into a hold file, is the update to the database delayed? If the "N" and the "D" order complete separately, how does that affect the manner in which trouble tickets are handled in the LMOS database?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 17 in Kentucky Public Service Commission Case 2001-105.

REQUEST: If LMOS is not updated to reflect migration of a customer to a CLEC serving the customer via UNE-P, how are CLEC trouble reports reflected in BellSouth's metric for troubles within thirty days? Would troubles in such cases be calculated as if they were for a BellSouth retail customer or for the CLEC's customer?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 18 in Kentucky Public Service Commission Case 2001-105.

REQUEST: Identify precisely how each of BellSouth's charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 24 in Kentucky Public Service Commission Case 2001-105.

REQUEST: What is the complete list of functions for wholesale and retail provisioning of line sharing and what are the associated task times?

RESPONSE: BellSouth objects to this Request to the extent that it asks about retail line sharing because BellSouth does not engage in line sharing for itself.

REQUEST: Does BellSouth provide a line splitter in some line sharing arrangements with data-CLECs? If your answer is in the affirmative, please state on what terms and conditions the splitter is provided.

RESPONSE: Yes. BellSouth offers line sharing with various splitter ownership options. BellSouth offers to own and lease splitters to data-CLECs, or a data-CLEC may provide its own splitters. Although BellSouth has no legal obligation to provide splitters, beginning on June 6, 2000, BellSouth allowed data-CLECs to order splitters in two different increments: (1) 96-line unit compliment; or (2) a 24-line unit compliment. BellSouth also made an 8-port option available July 25, 2001. Under each option, BellSouth purchases, installs, inventories, leases, and maintains the splitters. BellSouth installs a splitter in its equipment space or in a common area close to the requesting data-CLEC's collocation area. BellSouth will provide to requesting carriers loop and splitter functionality that is compatible with any transmission technology that the requesting carrier seeks to deploy using the high frequency portion of the loop, provided that such transmission technology is deployable pursuant to Section 51.230 of the FCC's rules. BellSouth provides a bantam jack at the splitter so the data-CLEC can test the high frequency portion of the loop.

Under each option, a group of 96, 24, or 8 splitter ports are assigned to a specific data-CLEC. The splitter is connected to BellSouth's frame via cabling. One cable is connected to the splitter carrying the shared voice and data signal from the frame. A second cable carries the voice traffic back to the frame. A third cable from the splitter carries the data traffic to the frame

After the cables are run between the splitter and the frame, the technician performs a "streaker card" test. This test insures appropriate connectivity between the splitter and the BellSouth frame. Once the splitter is installed and inventoried, a data-CLEC order to provision line sharing for an end user specifies the splitter assignment and cable pair to be used for the high frequency portion of the loop.

REQUEST: If a CLEC acquires the voice service for an end user that is presently in a line sharing arrangement between an ILEC providing voice service and a data-CLEC, when BellSouth has previously provided a line splitter or the same functionality to the data-CLEC, will BellSouth continue to provide the line splitter or functionality? If so, please state on what terms and conditions the same will be provided.

RESPONSE: Yes. Although there is no regulatory requirement to do so BellSouth will continue to provide the splitter in the event a CLEC acquires the voice service for an end user that is presently in a line sharing arrangement between BellSouth providing voice service and a data-CLEC, when BellSouth has previously provided a line splitter, provided certain conditions are met. If a data-CLEC engaged in line sharing is leasing a splitter form BellSouth and a CLEC wins the voice customer, if the data provider does not change and there is an agreement between the voice-CLEC and the data-CLEC to allow the same data-CLEC to use its high frequency spectrum, Bellsouth would not require a wiring change. BellSouth will continue to bill the data-CLEC for the Splitter.

REQUEST: If BellSouth or its affiliate is providing data services to an end user in a line sharing arrangement, if a CLEC acquires the end user for voice service, will BellSouth or its affiliate continue to provide data service using the shared lines? If so, please state on what terms and conditions the same will be provided.

RESPONSE: BellSouth objects to this Request to the extent that it asks about retail line sharing because BellSouth does not engage in line sharing for itself.

REQUEST: Has BellSouth or an affiliate provided data services to an end user in a line sharing arrangement after a CLEC has acquired the end user for voice service? If so, please state on what terms and conditions when the same occurred, and on what terms and conditions the same was provided.

RESPONSE: No. As previously stated, BellSouth offers its BellSouth ADSL service via the FCC Access Tariff. BellSouth offers this DSL transport to Internet Service Providers ("ISPs"), who in turn, sell its Internet Service to the end users. Accordingly, BellSouth does not provide 'data services to an end user' in a line sharing arrangement.

In a 'line sharing arrangement', by definition, BellSouth is the voice provider. In accordance with the FCC's definition of line sharing, should a 'CLEC acquire the end user for voice service', a 'line sharing arrangement' no longer exists, and the loop is no longer eligible for Line Sharing.

BellSouth only provides its ADSL transport service to ISPs, and only when it is the voice provider. Accordingly, if a CLEC has acquired the end user for voice service, the end user or the ISP would not be able to purchase BellSouth' ADSL transport offering.

Arrangements where other than the ILEC is providing the voice, and a data-CLEC is providing the data service, is referred to as line splitting. In a line splitting arrangement, the CLEC may contract with a data-CLEC of their choice to allow access to the high frequency spectrum of its loop to provide the data services.

At one period of time BellSouth did not have edits in place to prevent the sale of BellSouth ADSL service on UNE-P, and some sales of this type did erroneously occur. BellSouth is currently in the process of providing the CLECs with the option of converting the voice service to BellSouth resale service. Should the CLEC decide not to exercise this option, BellSouth will remove the xDSL service.

REQUEST: If a CLEC acquires the end user for voice service, and data service was not previously provided the end user using the shared line, will BellSouth or its affiliate provide data service using the shared lines? If so, please state on what terms and conditions the same will be provided.

RESPONSE: No. BellSouth does not provide data services to an end user using the CLECs loop. However, should a CLEC acquire the end user for voice service, they may contract with any data-CLEC of their choice to allow access to the high frequency spectrum of its loop to provide the data services.

The FCC was very explicit in its Third Report and Order On Reconsideration In CC Docket No. 98-147 and Fourth Report and Order On Reconsideration In CC Docket No. 96-98, January 19, 2001, at ¶ 16, when it said:

> *We deny, however, AT&T's request that the Commission clarify that incumbent LECs must continue to provide xDSL services in the event customers choose to obtain voice service from a competing carrier on the same line because we find that the Line Sharing Order contained no such requirement.*

REQUEST: Has BellSouth or an affiliate provided data service using the shared lines when a CLEC acquired the end user for voice service, and data service had not previously provided the end user using the shared line? If so, please state on what terms and conditions the same was provided.

RESPONSE: No. Again, BellSouth does not provide data services to an end user using CLEC shared lines. However, should a CLEC acquire the end user for voice service, they may contract with any data-CLEC of their choice to provide the data services.

At one period of time BellSouth did not have edits in place to prevent the sale of BellSouth ADSL service on UNE-P, and some sales of this type did erroneously occur. BellSouth is currently in the process of providing the CLECs with the option of converting the voice service to BellSouth resale service. Should the CLEC decide not to exercise this option, BellSouth will remove the xDSL service.

REQUEST: If a CLEC acquires the voice service for an end user and leases a loop-port combination from BellSouth, and the end user wants to obtain data services over the shared line, will the existing UNE combination have to be "replaced" with the unbundled loop, unbundled port, and cross connects?

RESPONSE: Yes. By FCC definition a loop-port combination (UNE-P) contains only the loop and the port combined in the ILECs network. Once other items (splitters, cross connects, etc.) are included, the arrangement is no longer a UNE-P, and should the CLEC desire to enter into a line splitting arrangement, it would need to replace the UNE-P with the unbundled loop, unbundled port, and cross connects.

REQUEST: If your answer to the preceding interrogatory is in the affirmative, will the new arrangement require a new service order?

A. If so, is there presently an ordering mechanism to "convert" the UNE combination to discrete elements (loop, port, cross connects)? Please describe the OSS (manual or electronic, type, etc.) by which the same is to be accomplished.

B. If not, when does BellSouth contemplate having such a mechanism, and with what system or systems?

RESPONSE:

a. Yes. There is a manual ordering process available to CLECs (via a single LSR) for the conversion of UNE-P into the discrete elements necessary to provide an end user data service over the high frequency spectrum of a UNE loop and port, when the CLEC provides its own splitter and DSLAM.
b. Manual ordering process is available today. Electronic ordering will be available for CLEC CAVE Testing December 2001, and generally available January, 2002.

REQUEST: What efforts, if any, is BellSouth undertaking to lower the provisioning interval of lines-shared loops? Please provide any and all information supporting your response.

RESPONSE: BellSouth objects to this Request to the extent it implies that BellSouth needs to lower its provisioning interval for line shared loops.

REQUEST: Does BellSouth intend to have all its splitter installations reviewed for quality control? If so, when does BellSouth anticipate the review to take place? If not, what is the reason behind this decision? If such a check is completed, please produce research results regarding the total quality check of all splitter installations in all central offices in Tennessee.

RESPONSE: Yes. BellSouth completed a review of all of its splitter installations in March 2001. A report of that effort is attached.

ATTACHMENT ONE
(TWO PAGES)

REQUEST: What business processes have been changed since September to improve the provisioning of line sharing? What process improvements are being prepared for line sharing provisioning?

RESPONSE: BellSouth objects to this Request to the extent it implies that BellSouth needs to improve provisioning of line sharing.

REQUEST: Please provide any standard collocation interconnection agreement terms and conditions that BellSouth uses for its interconnection agreements with competing local exchange carriers in Tennessee.

RESPONSE: Please refer to BellSouth's response to AT&T's First Data Request, Interrogatory Item 167 in Kentucky Public Service Commission Case 2001-105.

REQUEST: State whether terms or conditions for collocation, physical or virtual, are contained in BellSouth's tariffs for Tennessee. If so, identify the tariff(s).

RESPONSE: Terms and conditions for physical collocation are not contained in a tariff in Tennessee. BellSouth provides physical collocation through negotiated Interconnection Agreements. Terms and conditions for virtual collocation are in BellSouth Tariff F.C.C. No.1 ("FCC Virtual Tariff"), Section 20.

REQUEST: State whether BellSouth disagrees with the findings or conclusions of the FCC in In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Dockets Nos. 98-147 and 96-98, FCC 00-297, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98 (rel. August 10, 2000) ("Order on Reconsideration"). If so, state the findings or conclusions with which BellSouth is in disagreement, whether BellSouth filed any comments with the FCC with regard to its proposed rulemaking that resulted in the Order on Reconsideration, and whether BellSouth has filed any motion, petition, comments or other legal document that states such disagreement(s), and the status of any such proceedings. Please attach a copy of any such motion, petition or comment(s) to your answers to these interrogatories.

RESPONSE: BellSouth objects to this Request on the grounds that it is overbroad, unduly burdensome to the extent it seeks to require BellSouth to analyze every finding and conclusion in the FCC's order.

In an attempt to be responsive to this item, please refer to BellSouth's response to WorldCom's First Data Request, Item 43 in Kentucky Public Service Commission, Case 2001-105.

REQUEST: The Order on Reconsideration sets out a process by which ILECs may request additional provisioning intervals from a state commission. See Order on Reconsideration at ¶¶ 36, 37. State whether BellSouth filed anything with the Commission or the FCC to justify intervals longer than the national default standard stated in the Order on Reconsideration, and attach a copy of the same to your answers to these interrogatories.

RESPONSE: Please refer to BellSouth's response to WorldCom's First Data Request, Item 44 in Kentucky Public Service Commission, Case 2001-105.

REQUEST: For what states in BellSouth's nine (9) state territory does it contend the order entered by the FCC in In the Matter of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 ("BellSouth Conditional Waiver Order"), applies to a request for physical collocation?

RESPONSE: BellSouth objects to this Request on the grounds that it is vague to the extent that it implies that FCC orders do not apply to all states. Subject to and without waiving this objection, BellSouth will respond about the BellSouth Conditional Waiver Order.

Please refer to BellSouth's response to WorldCom's First Data Request, Item 46 in Kentucky Public Service Commission, Case 2001-105.

REQUEST: State whether you contend that cageless physical collocation may not be provisioned in a shorter interval than caged physical collocation. If so, state each and every fact that supports your position.

RESPONSE: The interval for provisioning cageless collocation should be substantially the same as that for caged collocation because the work activities that BellSouth must perform are substantially the same in either case. The fact that BellSouth does not have to build a cage for a cageless arrangement in no way justifies a shorter interval. BellSouth's provisioning interval for physical collocation is not controlled by the time required to construct an arrangement enclosure. The construction of the cage is done concurrently with the provisioning of the physical collocation space and thus does not result in significant additional time. Often the construction of the cage can be done in a single day. BellSouth still must do the same infrastructure work for a cageless arrangement as would be necessary for a caged arrangement, including the completion of the space conditioning, adding to or upgrading HVAC for that area, adding to or upgrading the power plant capacity and power distribution mechanism, and building out network infrastructure components such as the cable racking and number of cross-connects requested by the CLEC. The absence of a cage has little, if any, bearing on the overall provisioning interval. Because space preparation and network infrastructure work must be completed regardless of the type of arrangement selected and because construction of a cage is performed concurrently with and not in addition to those work activities, there is no justification for a shorter provisioning interval for cageless physical collocation.

REQUEST: State whether cageless and virtual collocation are set up physically the same way. If they are not, state the differences between these two forms of collocation.

RESPONSE: Cageless physical collocation is more closely related to a physical caged collocation arrangement than to a virtual collocation arrangement. Likewise, the provisioning processes for virtual collocation and cageless physical collocation are significantly different. In a cageless physical collocation arrangement, a competitor leases space to place its equipment within an ILEC's premises. The CLEC has physical access to this space to install, maintain, and repair its equipment. In a virtual collocation arrangement, the CLEC, however, does not have physical access to the ILEC's premises. Instead, the equipment is under the physical control of the ILEC and the ILEC is responsible for installing, maintaining, and repairing the equipment designated by the CLEC.

Virtual collocation and physical collocation (either caged or cageless) are two distinctly different service offerings. While a collocator has direct access to its physical collocation equipment on a twenty-four hour a day, seven-day a week basis, access to virtual collocation is restricted to limited inspection visits only. Because BellSouth leases virtual collocation equipment from the carrier and assumes the maintenance and repair responsibilities at the direction of the collocator, virtual collocation arrangements are most often placed within the BellSouth equipment line-up where BellSouth usually has conditioned space in anticipation of installing its own equipment. BellSouth is required to permit virtual collocation within its reserved growth space under 47 C.F.R. § 51.323(f)(5). For cageless collocation (in the absence of binding CLEC forecasts), BellSouth has no way to determine what the CLECs will be requesting to install in the office and therefore

RESPONSE (Cont'd):

cannot reasonably precondition the office with cable racking, power, etc., to accommodate cageless equipment growth. Virtual collocation, on the other hand, is typically requested when there is no more room in the central office in which to grow physical collocation. As stated above, BellSouth is required to give up available space in its existing equipment line-ups to accommodate virtual collocation requests. This space may be pre-conditioned with the associated infrastructures because it is part of the space BellSouth has forecasted for its own future growth.

As noted above, virtual collocation arrangements are assigned space in standard equipment rack line-ups. BellSouth constructs overhead cable rack, fiber duct, frame and aisle lighting, and framework ground conductors as required to support the collocated equipment racks. On the other hand, cageless physical collocation arrangements require isolated grounding and/or utilize system-specific cable racking. For this type of arrangement, the collocator must request floor space similar to a caged arrangement. The collocator is responsible for the cable racking, frame and aisle lighting and grounding required for the system within the assigned space. BellSouth installs cable rack, fiber duct and grounding conductors to the perimeter of the assigned space to interconnect with the collocated equipment. No physical cage or wall is constructed.

A virtual collocation arrangement is cabled to BellSouth's Battery Distribution Fuse Boards (BDFBs) for all DC power requirements. With physical collocation (either cageless or caged), the collocator has the option of cabling to a BellSouth BDFB or installing its own BDFB. If the collocator installs its own BDFB, primary power feeders must be cabled to the BellSouth –48V Power Board. In such cases, BellSouth may be required to construct power feeder cable rack between the collocated BDFB and the BellSouth power board.

RESPONSE (Cont'd):

Circuits from a virtual collocation arrangement are cabled directly to BellSouth interconnecting frames, such as the Main Distributing Frame, Digital Cross Connect Frames or Lightguide Cross Connect Frames. If the collocator's physical collocation Interconnection Agreement does not specify an intermediate Point of Termination (POT), the physical collocation arrangement will be cabled in the same manner as a virtual collocation arrangement to BellSouth interconnection frames. If the collocator's Interconnection Agreement requires an intermediate POT, BellSouth installs cable from the interconnection frame(s) to the POT. BellSouth or the collocator, as determined by the collocator may provide the POT.

REQUEST: State whether any time frame in which cageless collocation can be provisioned is also appropriate for virtual collocation. If not, state each and every fact supporting your position.

RESPONSE: As explained in detail in response to Item No. 76, BellSouth believes that the provisioning of virtual collocation generally does not require as much space and infrastructure preparation work as is required for cageless (or caged) physical collocation. Therefore, the time frames in which virtual collocation can be provisioned are inappropriately short and therefore, insufficient for the provision of cageless physical collocation. However, an appropriate time frame for provisioning cageless physical collocation (that is, longer than the existing interval for virtual collocation) should generally allow sufficient time to provision virtual collocation.

Most virtual collocation arrangements consist of 1 to 2 bays of equipment. The quantity of virtual collocation arrangements represents a very small percentage of all collocated equipment arrangements in BellSouth. Since BellSouth is responsible for maintenance and operation of virtual collocated equipment, it is typically installed within the floor space reserved for BellSouth equipment growth. This growth space can, on an infrequent basis, accommodate 1 to 2 bays of equipment without significant space preparation work. Thus, the average provisioning interval for virtual collocation is less than that typically required for cageless physical collocation.

Cageless physical collocation occurs much more frequently than virtual collocation and may consist of several equipment frames. As with a collocator's reserved growth space, BellSouth does not assign floor space to physical collocated equipment within the space which BellSouth is allowed to reserve for its own equipment growth. Dependent upon the specific conditions within a premise,

RESPONSE (Cont'd):

space preparation is much more likely to be required for physical collocation, requiring a longer provisioning interval.

There are occasions where previously conditioned floor space is available to accommodate cageless physical collocation. In such cases, the actual provisioning interval for a 1 or 2 bay cageless physical collocation arrangement with the same power and interconnection arrangements as virtual collocated equipment will be equivalent to the virtual collocation provisioning interval. Such conditions are the exception, not the rule, and cannot rationally be used as the basis for shortening the cageless physical collocation provisioning interval.

On August 10, 2000, the FCC issued its Collocation Reconsideration Order setting forth default intervals for physical collocation where state regulatory authorities had not established such intervals. Effective June 25, 2001, the TRA's Final Order on Arbitration in regard to Intermedia in Docket No. 99-00948, which is consistent with the TRA's Second Interim Order on Arbitration in regard to ITC^DeltaCom Communications, Inc., in Docket No. 99-00430, established the provisioning intervals for physical cageless (and caged) collocation. These intervals are different from the national default intervals established by the FCC in its Collocation Reconsideration Order and the FCC Memorandum Opinion and Order, CC Docket No. 98-147, released February 21, 2001. The TRA set the provisioning intervals for physical cageless collocation as thirty (30) calendar days after the CLEC places the firm order when there is conditioned space and the CLEC installs the bay/racks; in no event should the provisioning interval for cageless collocation exceed ninety (90) calendar days from the date of the firm order. The TRA has indicated that these arbitration decisions should be equally applicable to all CLECs. Therefore, BellSouth will comply with the TRA Orders specified.

RESPONSE (Cont'd):

Neither the FCC nor the TRA has established provisioning intervals for virtual collocation. Notwithstanding that fact, BellSouth will provide virtual collocation in 50 calendar days under ordinary circumstances and 75 days under extraordinary circumstances.

REQUEST: Will BellSouth provide DC power to collocated equipment in adjacent collocation space? If not, identify any provision of any code that supports your position that DC power should not be provided by BellSouth to adjacent collocation space.

RESPONSE: No. The FCC rules do not require BellSouth to provide DC power to an adjacent collocation arrangement "if it provides DC power to the equipment in the central office," 47 C.F.R. 51.323(k)(3). Providing DC power to an adjacent collocation arrangement runs afoul of the National Electrical Safety Code, which allows the powering of one structure from another only if both structures are under one management. (See attached Article 225). BellSouth is willing to provide AC power to an adjacent collocation arrangement, which is consistent with the manner in which BellSouth would provide power to all of its own adjacent arrangements or remote sites. However, approval must be obtained from the appropriate local authority, given that Article 225 of the above-mentioned code does not specifically allow power circuits to be run between buildings with different owners. In addition to the National Electrical Code issue, it is economically foolish to run DC power to an adjacent structure due to voltage drop requirements and issues associated with running DC power outdoors. DC cable costs increase exponentially with cable distance due to voltage drop. DC power cable that meets TelCordia GR-347-CORE, Issue 1 11/96 "Generic Requirements for Central Office Power Wire" are not rated for outdoor use. Finally, DC power in a wet environment is highly corrosive.

ATTACHMENT ONE
(Six Pages)

the total load, for a new restaurant shall be permitted in accordance with Table 220-36 in lieu of Part B of this article.

The overload protection of the service-entrance conductors shall be in accordance with Sections 230-90 and 240-3.

Feeder conductors shall not be required to be of greater ampacity than the service-entrance conductors.

Service-entrance or feeder conductors whose demand load is determined by this optional calculation shall be permitted to have the neutral load determined by Section 220-22.

Table 220-36. Optional Method — Demand Factors for Service-Entrance and Feeder Conductors for New Restaurants

Total Connected Load (kVA)	All Electric Demand Factor (Percent)	Not All Electric Demand Factor (Percent)
0–250	80	100
251–280	70	90
281–325	60	80
326–375	50	70
376–800	50	65
Over 800	50	50

Note: Add all electrical loads, including both heating and cooling loads, to compute the total connected load. Select the one demand factor that applies from the table and multiply the total connected load by this single demand factor.

D. Method for Computing Farm Loads

220-40. Farm Loads — Buildings and Other Loads.

(a) Dwelling Unit. The feeder or service load of a farm dwelling unit shall be computed in accordance with the provisions for dwellings in Part B or C of this article. Where the dwelling has electric heat and the farm has electric grain-drying systems, Part C of this article shall not be used to compute the dwelling load.

(b) Other than Dwelling Unit. For each farm building or load supplied by two or more separate branch circuits, the load for feeders, service-entrance conductors, and service equipment shall be computed in accordance with demand factors not less than indicated in Table 220-40.

FPN: See Section 230-21 for overhead conductors from a pole to a building or other structure.

220-41. Farm Loads — Total. The total load of the farm for service-entrance conductors and service equipment shall be computed in accordance with the farm dwelling unit load and demand factors specified in Table 220-41. Where there is equipment in two or more farm equipment buildings or for loads having the same function, such loads shall be computed in accordance with Table 220-40 and shall be permitted to be combined as a single load in Table 220-41 for computing the total load.

Table 220-40. Method for Computing Farm Loads for Other than Dwelling Unit

Ampere Load at 240 Volts Maximum	Demand Factor (Percent)
Loads expected to operate without diversity, but not less than 125 percent full-load current of the largest motor and not less than the first 60 amperes of load	100
Next 60 amperes of all other loads	50
Remainder of other load	25

FPN: See Section 230-21 for overhead conductors from a pole to a building or other structure.

Table 220-41. Method for Computing Total Farm Load

Individual Loads Computed in Accordance with Table 220-40	Demand Factor (Percent)
Largest load	100
Second largest load	75
Third largest load	65
Remaining loads	50

Note: To this total load, add the load of the farm dwelling unit computed in accordance with Part B or C of this article. Where the dwelling has electric heat and the farm has electric grain-drying systems, Part C of this article shall not be used to compute the dwelling load.

Article 225 — Outside Branch Circuits and Feeders

225-1. Scope. This article covers requirements for outside branch circuits and feeders run on or between buildings, structures, or poles on the premises; and electric equipment and wiring for the supply of utilization equipment that is located on or attached to the outside of buildings, structures, or poles.

FPN: For additional information on wiring over 600 volts, see *National Electrical Safety Code*, ANSI C2-1997.

225-2. Other Articles. Application of other articles, including additional requirements to specific cases of equipment and conductors, is as follows:

	Article
Branch circuits	210
Class 1, Class 2, and Class 3 remote-control, signaling, and power-limited circuits	725
Communications circuits	800
Community antenna television and radio distribution systems	820
Conductors for general wiring	310
Electrically driven or controlled irrigation machines	675
Electric signs and outline lighting	600
Feeders	215
Fire alarm systems	760
Fixed outdoor electric deicing and snow-melting equipment	426
Floating buildings	553
Grounding	250
Hazardous (classified) locations	500
Hazardous (classified) locations — specific	510
Marinas and boatyards	555
Messenger supported wiring	321
Open wiring on insulators	320
Over 600 volts, general	490
Overcurrent protection	240
Radio and television equipment	810
Services	230
Solar photovoltaic systems	690
Swimming pools, fountains, and similar installations	680
Use and identification of grounded conductors	200

A. General

225-3. Calculation of Load.

(a) Branch Circuits. The load on outdoor branch circuits shall be as determined by Section 220-3.

(b) Feeders. The load on outdoor feeders shall be as determined by Part B of Article 220.

225-4. Conductor Covering. Where within 10 ft (3.05 m) of any building or structure other than supporting poles or towers, open individual (aerial) overhead conductors shall be insulated or covered. Conductors in cables or raceways, except Type MI cable, shall be of the rubber-covered type or thermoplastic type and, in wet locations, shall comply with Section 310-8. Conductors for festoon lighting shall be of the rubber-covered or thermoplastic type.

Exception: Equipment grounding conductors and grounded circuit conductors shall be permitted to be bare or covered as specifically permitted elsewhere in this Code.

225-5. Size of Conductors. The ampacity of outdoor branch-circuit and feeder conductors shall be in accordance with Section 310-15 based on loads as determined under Section 220-3 and Part B of Article 220.

225-6. Conductor Size and Support.

(a) Overhead Spans. Open individual conductors shall not be smaller than the following:

(1) For 600 volts, nominal, or less, No. 10 copper or No. 8 aluminum for spans up to 50 ft (15.2 m) in length and No. 8 copper or No. 6 aluminum for a longer span, unless supported by a messenger wire

(2) For over 600 volts, nominal, No. 6 copper or No. 4 aluminum where open individual conductors and No. 8 copper or No. 6 aluminum where in cable

(b) Festoon Lighting. Overhead conductors for festoon lighting shall not be smaller than No. 12 unless the conductors are supported by messenger wires. In all spans exceeding 40 ft (12.2 m), the conductors shall be supported by messenger wire. The messenger wire shall be supported by strain insulators. Conductors or messenger wires shall not be attached to any fire escape, down spout, or plumbing equipment.

225-7. Lighting Equipment Installed Outdoors.

(a) General. For the supply of lighting equipment installed outdoors, the branch circuits shall comply with Article 210 and (b) through (d).

(b) Common Neutral. The ampacity of the neutral conductor shall not be less than the maximum net computed load current between the neutral and all ungrounded conductors connected to any one phase of the circuit.

(c) 277 Volts to Ground. Circuits exceeding 120 volts, nominal, between conductors and not exceeding 277 volts, nominal, to ground shall be permitted to supply lighting fixtures for illumination of outdoor areas of industrial establishments, office buildings, schools, stores, and other commercial or public buildings where the fixtures are not less than 3 ft (914 mm) from windows, platforms, fire escapes, and the like.

(d) 600 Volts Between Conductors. Circuits exceeding 277 volts, nominal, to ground and not exceeding 600 volts, nominal, between conductors shall be permitted to supply the auxiliary equipment of electric-discharge lamps in accordance with Section 210-6(d)(1).

225-9. Overcurrent Protection. Overcurrent protection shall be in accordance with Section 210-20 for branch circuits and Article 240 for feeders.

225-10. Wiring on Buildings. The installation of outside wiring on surfaces of buildings shall be permitted for circuits of not over 600 volts, nominal, as open wiring on insulators, as multiconductor cable, as Type MC cable, as Type MI cable, as messenger supported wiring, in rigid metal conduit, in intermediate metal conduit, in rigid nonmetallic conduit, in cable trays, as cablebus, in wireways, in auxiliary gutters, in electrical metallic tubing, in flexible metal conduit, in liquidtight flexible metal conduit, in liquidtight flexible nonmetallic conduit, and in busways. Circuits of over 600 volts, nominal, shall be installed as provided in Section 300-37. Circuits for signs and outline lighting shall be installed in accordance with Article 600.

225-11. Circuit Exits and Entrances. Where outside branch and feeder circuits leave or enter a building, the requirements of Sections 230-52 and 230-54 shall apply.

225-12. Open-Conductor Supports. Open conductors shall be supported on glass or porcelain knobs, racks, brackets, or strain insulators.

225-14. Open-Conductor Spacings.

(a) 600 Volts, Nominal, or Less. Conductors of 600 volts, nominal, or less, shall comply with the spacings provided in Table 230-51(c).

(b) Over 600 Volts, Nominal. Conductors of over 600 volts, nominal, shall comply with the spacings provided in Sections 110-36 and 490-24.

(c) Separation from Other Circuits. Open conductors shall be separated from open conductors of other circuits or systems by not less than 4 in. (102 mm).

(d) Conductors on Poles. Conductors on poles shall have a separation of not less than 1 ft (305 mm) where not placed on racks or brackets. Conductors supported on poles shall provide a horizontal climbing space not less than the following:

(1) Power conductors below communications conductors — 30 in. (762 mm)
(2) Power conductors alone or above communications conductors:
300 volts or less — 24 in. (610 mm)
Over 300 volts — 30 in. (762 mm)
(3) Communications conductors below power conductors — same as power conductors
(4) Communications conductors alone — no requirement

225-15. Supports Over Buildings. Supports over a building shall be in accordance with Section 230-29.

225-16. Point of Attachment to Buildings. The point of attachment to a building shall be in accordance with Section 230-26.

225-17. Means of Attachment to Buildings. The means of attachment to a building shall be in accordance with Section 230-27.

225-18. Clearance from Ground. Overhead spans of open conductors and open multiconductor cables of not over 600 volts, nominal, shall conform to the following:

10 ft (3.05 m) — above finished grade, sidewalks, or from any platform or projection from which they might be reached where the voltage does not exceed 150 volts to ground and accessible to pedestrians only

12 ft (3.66 m) — over residential property and driveways, and those commercial areas not subject to truck traffic where the voltage does not exceed 300 volts to ground

15 ft (4.57 m) — for those areas listed in the 12-ft (3.66-m) classification where the voltage exceeds 300 volts to ground

18 ft (5.49 m) — over public streets, alleys, roads, parking areas subject to truck traffic, driveways on other than residential property, and other land traversed by vehicles such as cultivated, grazing, forest, and orchard

FPN: For clearances of conductors of over 600 volts, see *National Electrical Safety Code*, ANSI C2-1997.

225-19. Clearances from Buildings for Conductors of Not Over 600 Volts, Nominal.

(a) Above Roofs. Overhead spans of open conductors and open multiconductor cables shall have a vertical clearance of not less than 8 ft (2.44 m) above the roof surface. The vertical clearance above the roof level shall be maintained for a distance not less than 3 ft (914 mm) in all directions from the edge of the roof.

Exception No. 1: The area above a roof surface subject to pedestrian or vehicular traffic shall have a vertical clearance from the roof surface in accordance with the clearance requirements of Section 225-18.

Exception No. 2: Where the voltage between conductors does not exceed 300, and the roof has a slope of 4 in. (102 mm) in 12 in. (305 mm) or greater, a reduction in clearance to 3 ft (914 mm) shall be permitted.

Exception No. 3: Where the voltage between conductors does not exceed 300, a reduction in clearance above only the overhanging portion of the roof to not less than 18 in. (457 mm) shall be permitted if (1) not more than 6 ft (1.83 m) of the conductors, 4 ft (1.22 m) horizontally, pass above

the roof overhang, and (2) they are terminated at a through-the-roof raceway or approved support.

Exception No. 4: The requirement for maintaining the vertical clearance 3 ft (914 mm) from the edge of the roof shall not apply to the final conductor span where the conductors are attached to the side of a building.

(b) From Nonbuilding or Nonbridge Structures. From signs, chimneys, radio and television antennas, tanks, and other nonbuilding or nonbridge structures, clearances — vertical, diagonal, and horizontal — shall not be less than 3 ft (914 mm).

(c) Horizontal Clearances. Clearances shall not be less than 3 ft (914 mm).

(d) Final Spans. Final spans of feeders or branch circuits to a building they supply or from which they are fed shall be permitted to be attached to the building, but they shall be kept not less than 3 ft (914 mm) from windows that are designed to be opened, doors, porches, balconies, ladders, stairs, fire escapes, or similar locations. Vertical clearance of final spans above, or within 3 ft (914 mm) measured horizontally of, platforms, projections, or surfaces from which they might be reached shall be maintained in accordance with Section 225-18.

Exception: Conductors run above the top level of a window shall be permitted to be less than the 3 ft (914 mm) requirement above.

Overhead branch-circuit and feeder conductors shall not be installed beneath openings through which materials may be moved, such as openings in farm and commercial buildings, and shall not be installed where they will obstruct entrance to these building openings.

(e) Zone for Fire Ladders. Where buildings exceed three stories or 50 ft (15.2 m) in height, overhead lines shall be arranged, where practicable, so that a clear space (or zone) at least 6 ft (1 83 m) wide will be left either adjacent to the buildings or beginning not over 8 ft (2.44 m) from them to facilitate the raising of ladders when necessary for fire fighting.

FPN: For clearance of conductors over 600 volts, see *National Electrical Safety Code*, ANSI C2-1997.

225-20. Mechanical Protection of Conductors. Mechanical protection of conductors on buildings, structures, or poles shall be as provided for services in Section 230-50.

225-21. Multiconductor Cables on Exterior Surfaces of Buildings. Supports for multiconductor cables on exterior surfaces of buildings shall be as provided in Section 230-51.

225-22. Raceways on Exterior Surfaces of Buildings. Raceways on exterior surfaces of buildings shall be raintight and arranged to drain.

Exception: Flexible metal conduit, where permitted in Section 350-5(1), shall not be required to be raintight.

225-24. Outdoor Lampholders. Where outdoor lampholders are attached as pendants, the connections to the circuit wires shall be staggered. Where such lampholders have terminals of a type that puncture the insulation and make contact with the conductors, they shall be attached only to conductors of the stranded type.

225-25. Location of Outdoor Lamps. Locations of lamps for outdoor lighting shall be below all energized conductors, transformers, or other electric utilization equipment, unless

(1) Clearances or other safeguards are provided for relamping operations, or
(2) Equipment is controlled by a disconnecting means that can be locked in the open position.

225-26. Vegetation. Vegetation such as trees shall not be used for support of overhead conductor spans.

Exception: For temporary wiring in accordance with Article 305.

B. More than One Building or Other Structure

225-30. Number of Supplies. Where more than one building or other structure is on the same property and under single management, each building or other structure served shall be supplied by one feeder or branch circuit unless permitted in (a) through (e). For the purpose of this section, a multiwire branch circuit shall be considered a single circuit.

(a) Special Conditions. Additional feeders or branch circuits shall be permitted to supply the following:

(1) Fire pumps
(2) Emergency systems
(3) Legally required standby systems
(4) Optional standby systems
(5) Parallel power production systems

(b) Special Occupancies. By special permission, additional feeders or branch circuits shall be permitted for

(1) Multiple-occupancy buildings where there is no available space for supply equipment accessible to all occupants, or
(2) A single building or other structure sufficiently large to make two or more supplies necessary.

(c) **Capacity Requirements.** Additional feeders or branch circuits shall be permitted where the capacity requirements are in excess of 2000 amperes at a supply voltage of 600 volts or less.

(d) **Different Characteristics.** Additional feeders or branch circuits shall be permitted for different voltages, frequencies, or phases, or for different uses, such as control of outside lighting from multiple locations.

(e) **Documented Switching Procedures.** Additional feeders or branch circuits shall be permitted to supply installations under single management where documented safe switching procedures are established and maintained for disconnection.

225-31. Disconnecting Means. Means shall be provided for disconnecting all ungrounded conductors that supply or pass through the building or structure.

225-32. Location. The disconnecting means shall be installed either inside or outside of the building or structure served or where the conductors pass through the building or structure. The disconnecting means shall be at a readily accessible location nearest the point of entrance of the conductors. For the purposes of this section, the requirements in Section 230-6 shall be permitted to be utilized.

Exception No. 1: For installations under single management, where documented safe switching procedures are established and maintained for disconnection, the disconnecting means shall be permitted to be located elsewhere on the premises.

Exception No. 2: For buildings or other structures qualifying under the provisions of Article 685, the disconnecting means shall be permitted to be located elsewhere on the premises.

Exception No. 3: For towers or poles used as lighting standards, the disconnecting means shall be permitted to be located elsewhere on the premises.

Exception No. 4: For poles or similar structures used only for support of signs installed in accordance with Article 600, the disconnecting means shall be permitted to be located elsewhere on the premises.

225-33. Maximum Number of Disconnects.

(a) **General.** The disconnecting means for each supply permitted by Section 225-30 shall consist of not more than six switches or six circuit breakers mounted in a single enclosure, in a group of separate enclosures, or in or on a switchboard. There shall be no more than six disconnects per supply grouped in any one location.

Exception: For the purpose of this section, disconnecting means used solely for the control circuit of the ground-fault protection system, installed as part of the listed equipment, shall not be considered a supply disconnecting means.

(b) **Single-Pole Units.** Two or three single-pole switches or breakers, capable of individual operation, shall be permitted on multiwire circuits, one pole for each ungrounded conductor, as one multipole disconnect, provided they are equipped with handle ties or a master handle to disconnect all ungrounded conductors with no more than six operations of the hand.

225-34. Grouping of Disconnects.

(a) **General.** The two to six disconnects as permitted in Section 225-33 shall be grouped. Each disconnect shall be marked to indicate the load served.

Exception: One of the two to six disconnecting means permitted in Section 225-33, where used only for a water pump also intended to provide fire protection, shall be permitted to be located remote from the other disconnecting means.

(b) **Additional Disconnecting Means.** The one or more additional disconnecting means for fire pumps or for emergency, legally required standby, or optional standby system permitted by Section 225-30 shall be installed sufficiently remote from the one to six disconnecting means for normal supply to minimize the possibility of simultaneous interruption of supply.

225-35. Access to Occupants. In a multiple-occupancy building, each occupant shall have access to the occupant's supply disconnecting means.

Exception: In a multiple-occupancy building where electric supply and electrical maintenance are provided by the building management and where these are under continuous building management supervision, the supply disconnecting means supplying more than one occupancy shall be permitted to be accessible to authorized management personnel only.

225-36. Suitable for Service Equipment. The disconnecting means specified in Section 225-31 shall be suitable for use as service equipment.

Exception: For garages and outbuildings on residential property, a snap switch or a set of 3-way or 4-way snap switches shall be permitted as the disconnecting means.

225-37. Identification. Where a building or structure has any combination of feeders, branch circuits, or services passing through it or supplying it, a permanent plaque or directory shall be installed at each feeder and branch-circuit disconnect location denoting all other services, feeders, or branch circuits supplying that building or structure or passing through

that building or structure and the area served by each. See Section 230-2(e).

Exception No. 1: A plaque or directory shall not be required for large capacity multibuilding industrial installations under single management, where it is ensured that disconnection can be accomplished by establishing and maintaining safe switching procedures.

Exception No. 2: This identification shall not be required for branch circuits installed from a dwelling unit to a second building or structure.

225-38. Disconnect Construction.

(a) Manually or Power Operable. The disconnecting means shall consist of either (1) a manually operable switch or a circuit breaker equipped with a handle or other suitable operating means or (2) a power-operable switch or circuit breaker, provided the switch or circuit breaker can be opened by hand in the event of a power failure.

(b) Simultaneous Opening of Poles. Each building or structure disconnecting means shall simultaneously disconnect all ungrounded supply conductors that it controls from the building or structure wiring system.

(c) Disconnection of Grounded Conductor. Where the building or structure disconnecting means does not disconnect the grounded conductor from the grounded conductors in the building or structure wiring, other means shall be provided for this purpose at the location of disconnecting means. A terminal or bus to which all grounded conductors can be attached by means of pressure connectors shall be permitted for this purpose.

In a multisection switchboard, disconnects for the grounded conductor shall be permitted to be in any section of the switchboard, provided any such switchboard section is marked.

(d) Indicating. The building or structure disconnecting means shall plainly indicate whether it is in the open or closed position.

225-39. Rating of Disconnect. The feeder or branch-circuit disconnecting means shall have a rating of not less than the load to be carried, determined in accordance with Article 220. In no case shall the rating be lower than specified in (a), (b), (c), or (d).

(a) One-Circuit Installation. For installations to supply only limited loads of a single branch-circuit, the branch-circuit disconnecting means shall have a rating of not less than 15 amperes.

(b) Two-Circuit Installations. For installations consisting of not more than two 2-wire branch circuits, the feeder or branch-circuit disconnecting means shall have a rating of not less than 30 amperes.

(c) One-Family Dwelling. For a one-family dwelling, the feeder disconnecting means shall have a rating of not less than 100 amperes, 3-wire.

(d) All Others. For all other installations, the feeder or branch-circuit disconnecting means shall have a rating of not less than 60 amperes.

225-40. Access to Overcurrent Protective Devices. Where a feeder overcurrent device is not readily accessible, branch-circuit overcurrent devices shall be installed on the load side, shall be mounted in a readily accessible location, and shall be of a lower ampere rating than the feeder overcurrent device.

C. Over 600 Volts

225-50. Warning Signs. Signs with the words "WARNING — HIGH VOLTAGE — KEEP OUT" shall be posted in plain view where unauthorized persons might come in contact with live parts.

225-51. Isolating Switches. Where oil switches or air, oil, vacuum, or sulfur hexafluoride circuit breakers constitute a building disconnecting means, an isolating switch with visible break contacts and meeting the requirements of Section 230-204(b), (c), and (d) shall be installed on the supply side of the disconnecting means and all associated equipment.

Exception: The isolating switch shall not be required where the disconnecting means is mounted on removable truck panels or metal-enclosed switchgear units that cannot be opened unless the circuit is disconnected and that, when removed from the normal operating position, automatically disconnect the circuit breaker or switch from all energized parts.

225-52. Location. A building or structure disconnecting means shall be located in accordance with Section 225-32, or it shall be electrically operated by a similarly located remote-control device.

225-53. Type. Each building or structure disconnect shall simultaneously disconnect all ungrounded supply conductors it controls and shall have a fault-closing rating not less than the maximum available short-circuit current available at its supply terminals.

Where fused switches or separately mounted fuses are installed, the fuse characteristics shall be permitted to contribute to the fault closing rating of the disconnecting means.

REQUEST: Does BellSouth have any safety concerns regarding the use by CLECs of batteries in enclosed adjacent collocation space? If so, state each and every such concern.

RESPONSE: An adjacent structure would be owned and operated by the CLEC and would be maintained by its own employees and/or contractors. Therefore, it would be up to the CLEC to determine if the use of batteries in an enclosed adjacent collocation space would comply with its own safety concerns, as well as the local, regional, state, and/or federal safety codes.

REQUEST: State whether BellSouth has provided AC to its remote spaces, which it has then converted to DC power.

RESPONSE: At all of BellSouth's remote terminal sites (that is, structures away from the central office building), AC power runs to the site and BellSouth then "converts" the AC power to DC power inside the remote site location. BellSouth has thousands of such arrangements in place across its nine-state region. Given that this is a normal business practice, BellSouth believes that this method of providing power is likewise appropriate for adjacent collocation arrangements and sees no safety concerns if the adjacent collocation construction complies with BellSouth's design and construction specifications.

REQUEST: State whether BellSouth has offered to provide or has provided DC power in other collocation arrangements outside the central office; namely, with respect to collocation at the remote terminal. If so, identify each such offer or provision of DC power, and state the terms and conditions thereof.

RESPONSE: With respect to collocation at remote terminals, BellSouth will provide DC power, if space is available, in an existing remote terminal but will not provide DC power to an adjacent collocation arrangement.

REQUEST: State what federal universal service funds have been received by BellSouth during the last twelve months. Of the funds received, what have been spent or are designated to be spent for facilities that support or use BellSouth's retail DSL service?

RESPONSE: BellSouth objects to this Request on the grounds that it is not relevant to this proceeding and that it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST: Does or will BellSouth unbundle dark fiber it leases either from a third party or from one of its subsidiaries?

RESPONSE: Yes, BellSouth recognizes an obligation to offer to CLECs 'spare' dark fiber from its inventory as outlined in interconnection agreements, regardless of its origins.

REQUEST: How is leased dark fiber inventoried?

RESPONSE: All dark fiber is inventoried in the same manner regardless of its origins. The inventory of individual fibers is accomplished through manually maintained fiber records of the particular geographic area where the fiber cable is located, by the Loop Capacity Manager ("LCM"). The entire cable sheath is maintained in the Plant Location Records Maintenance System ("PLRMS") or paper plats by the Records Maintenance Center ("RMC").

REQUEST: How does BellSouth deploy and provision dark fiber for one of its subsidiaries? Specifically, what are the terms and conditions (interval, maintenance, number of cross connects, number of strands, reclamation, etc.) governing such deployment and provisioning? Please provide all documents supporting your response.

RESPONSE: Unbundled dark fiber is a product that was specifically developed for the CLEC market and is not provided to BellSouth's subsidiaries.

REQUEST: Where has BellSouth deployed Wave Division Multiplexing? Please provide all documents supporting your response.

RESPONSE: FL: Boca Raton, Boynton Beach, Cocoa Beach, Daytona Beach, Delray Beach, Ft. Lauderdale, Hollywood, Jacksonville, Melbourne, Miami, Orlando, Orange Park, Pensacola, and West Palm Beach.

GA: Acworth, Albany, Americus, Atlanta, Augusta, Austell, Brunswick, Columbus, Douglasville, Duluth, Dunwoody, East Marietta, Fairburn, Fayetteville, Jonesboro, Lilburn, Marietta, Morrow, Norcross, Palmetto, Panola, Peachtree City, Power Springs, Powers Ferry, Roswell, Smyrna, Stockbridge, Stone Mountain, and Woodstock

LA: Madisonville and New Orleans

NC: Apex, Cary, Chapel Hill, Greensboro, Lenoir, Raleigh, and Stoney Point

SC: Columbia

TN: Memphis and Nashville

See attached documentation in support of above response.

ATTACHMENT ONE
(Two Pages)

Azalea Park	fl	orldflap
Belmont	fl	pnscflbl
Boca	fl	bcrtflma
Boca Teeca	fl	bcrtflbt
Boynton	fl	bybhflma
Brentwood	fl	ndadflbr
Canal	fl	miamflca
Delray	fl	dlbhflma
Fentress	fl	dybhflfn
Greenacres	fl	wpbhflga
Hialeah	fl	miamflhl
Jacaranda	fl	ftldflja
Lake Forest	fl	jcvlfllf
Melbourne	fl	mlbrflma
Merritt Island	fl	cocoflme
Pembroke Pines	fl	hlwdflpe
Ridgewood	fl	orpkflrw
Riviera Beach	fl	wpbhflrb
Sandalfoot	fl	bcrtflsa
Warrington	fl	pnscflwa
West Dade	fl	miamflwd
West Palm Beach	fl	wpbhflan
Acworth	ga	acwogama
Albany	ga	albygama
Americus	ga	amrcgama
Austell	ga	astlgama
Ben Hill	ga	atlngabh
Brunswick	ga	brwkgama
Buckhead	ga	atlngabu
Columbia Drive	ga	atlngacd
Courtland	ga	atlngacs
Douglasville	ga	dgvlgama
Duluth	ga	dlthgahs
Dunwoody	ga	dnwdgama
East Lake	ga	atlngael
East Marietta	ga	mrttgaea
East Point	ga	atlngaep
Fairburn	ga	frbngaeb
Fayetteville	ga	fyvlgasg
Fleming	ga	agstgafl
Forest Park	ga	atlngafp
Hollywood Road	ga	atlngahr
Jonesboro	ga	jnbogama
Lilburn	ga	llbngama
Marietta Main	ga	mrttgama
Meadow Wood	ga	clmbgamw
Morrow	ga	mrrwgama
Norcross	ga	nrcrgama
Palmetto	ga	plmtgama
Panola	ga	panlgama
Peachtree City	ga	ptcygama
Powder Springs	ga	pwspgaas

Powers Ferry	ga	smyrgapf
Roswell	ga	rswlgama
Smyrna	ga	smyrgama
Stockbridge	ga	stbrganh
Stone Mountain	ga	snmtgalr
Woodstock	ga	wdstgacr
Madisonville	la	mdvilama
Marrero	la	nworlamr
Apex	nc	apexncce
Ashland Dr	nc	gnboncas
Harper Ave	nc	lenrncha
Jones Franklin	nc	rlghncjo
Lawndale-gnbo	nc	gnboncla
Morgan St	nc	rlghncmo
Rosemary	nc	cphlncro
Stoney Point	nc	stpnncma
Weston	nc	caryncws
Arden	sc	clmascar
Bartlett	tn	mmphtnba
Chickasaw	tn	mmphtnct
Donelson	tn	nsvltndo

REQUEST: Of all of BellSouth's loops currently in service, what percentage of those loops is used for its own retail services? Please provide all documentation supporting your response.

RESPONSE: The percentage of loops in service in Tennessee used for BST retail services is 95.46 percent.

REQUEST: How many CLEC customers have been rejected for DSL service because a loop needed to be conditioned? Of those rejected, how many of the customers were able to get DSL service because BellSouth located another loop for them that did not require conditioning?

RESPONSE: BellSouth is not aware of any CLEC customer in Tennessee who has been rejected for DSL service because a loop needed to be conditioned.

REQUEST: What is BellSouth's schedule for deployment of its remote DSLAMs?

RESPONSE: BellSouth's schedule for deployment of remote DSLAMs (referred to as Neighborhood Portals on our web site) is available at the following URL:

www.bellsouth.com/broadband/dsl_solutions/discover/coverage/

REQUEST: How many customers will each BellSouth remotely deployed DSLAM have access to? Please provide all documentation supporting your response.

RESPONSE: BellSouth does not know how many customers each Remote DSLAM will have access to, given that the quantity of customers served by remote terminals varies.

REQUEST: How much of the cost of deploying BellSouth remote DSLAM capability is directly attributable to the provisioning of data services as opposed to providing voice services? Please provide all information supporting your response.

RESPONSE: The cost of deploying BellSouth remote DSLAM capability is directly attributable to the provisioning of DSL services. Voice service capability is pre-existing at the remote terminal, and is not changed with the deployment of DSL.

REQUEST: Except for prioritization of central office build-out, for what other purposes are CLEC and retail forecasts used?

RESPONSE: BellSouth objects to this Request on the grounds that it is vague as to what type of forecasts to which the Request is referring.

REQUEST: Where has BellSouth deployed VDSL?

RESPONSE: The meaning of the term "VDSL" is unclear. Assuming that "VDSL" stands for Video Digital Subscriber Line, BellSouth has not yet deployed VDSL anywhere in its network.

REQUEST: What percentages of BellSouth's outside plant is aerial, underground and buried in Tennessee? Please provide all documents supporting your response.

RESPONSE:

	Aerial	Underground	Buried
%	45.81	6.52	47.67

Response based upon sheath miles included from lines 16, 17, 18, 36, 37, & 38 from year-end 2000 form 7A attached.

ATTACHMENT ONE
(One Page)

FORM ..4272-OP
4TH QUARTER 2000
STATE OF TENNESSEE

BELLSOUTH TELECOMMUNIC..ONS
PLANT MILEAGE

QTRLY REPORT 7A
DATE PRINTED 01/03/01
DECEMBER BUSINESS

LINE	STATE TOTALS			THIS YEAR TO DATE A PLANT ADDED	B TRANSFERS INCLD IN COL. A	C PLANT RETIRED	D INCREASE SINCE DEC. 31 LAST	E TOTAL END OF MONTH	
1	MILES OF WIRE IN COPPER CABLE (CONDUCT.)	AERIAL	BUILDING	15,079+	573+	1,073+	14,006+	268,627+	1
2			OTHER	355,652+	5,877+	105,406+	250,246+	9,400,694+	2
3			TOTAL LINES 1-2	370,731+	6,450+	106,479+	264,252+	9,669,321+	3
4		UNDERGROUND		51,649+	914+	47,014+	4,635+	9,564,559+	4
5		BURIED		382,032+	4,764+	137,460+	244,572+	10,763,454+	5
6		SUBMARINE		0+	0+	0+	0+	19,361+	6
7		INTRABUILDING		1,368+	34-	1,324+	44+	255,148+	7
8		TOTAL LINES 3 - 7		805,780+	12,094+	292,277+	513,503+	30,271,843+	8

NOT USED

LINE				A	B	C	D	E	
14	SHEATH MILES OF COPPER CABLE	AERIAL	BUILDING	54+	0+	5-	59+	923+	14
15			OTHER	932+	8+	459+	473+	32,808+	15
16			TOT LINES 14-15	986+	8+	454+	532+	33,731+	16
17		UNDERGROUND		22+	1+	39+	17-	3,995+	17
18		BURIED		1,150+	14+	632+	518+	38,395+	18
19		SUBMARINE		0+	0+	0+	0+	9+	19
20		INTRABUILDING		1+	0+	4+	3-	604+	20
21		TOTAL LINES 16 - 20		2,159+	23+	1,129+	1,030+	76,734+	21
22	MILES OF CONDUIT	COAXIAL		0+	0+	0+	0+	173+	22
23		TRENCH MILES		45+	7+	3+	42+	2,132+	23
24		MILES OF DUCT		86+	16+	18+	68+	12,607+	24
25	NUMBER OF POLES			4,504+	120+	5,171+	667-	434,366+	25
26	MILES OF FIBER IN FIBER OPTIC CABLE	AERIAL	BUILDING	493+	69+	18+	475+	2,632+	26
27			OTHER	22,128+	431+	678+	21,450+	188,771+	27
28			TOT LINES 26-27	22,621+	500+	696+	21,925+	191,403+	28
29		UNDERGROUND		20,646+	3,537+	1,158+	19,488+	158,843+	29
30		BURIED		6,649+	202-	379+	6,270+	53,368+	30
31		SUBMARINE		8-	8-	0+	8-	44+	31
32		INTRABUILDING		0+	8-	0+	0+	96+	32
33		TOTAL LINES 28 - 32		49,908+	3,819+	2,233+	47,675+	403,754+	33
34	SHEATH MILES OF FIBER OPTIC CABLE	AERIAL	BUILDING	11+	0+	0+	11+	93+	34
35			OTHER	381+	6+	13+	368+	4,881+	35
36			TOT LINES 33-34	392+	6+	13+	379+	4,974+	36
37		UNDERGROUND		122+	16+	21+	101+	2,018+	37
38		BURIED		217+	1+	7+	210+	1,880+	38
39		SUBMARINE		0+	0+	0+	0+	0+	39
40		INTRABUILDING		0+	0+	0+	0+	1+	40
41		TOTAL LINES 36 - 40		731+	23+	41+	690+	8,873+	41

M. K. [signature]
SUPERVISOR - COMPTROLLERS

1-12-01
DATE

NOTICE: NOT FOR USE/DISCLOSURE OUTSIDE BELLSOUTH EXCEPT UNDER WRITTEN AGREEMENT

REQUEST: What are the task times/functions required to provision a stand-alone loop for a CLEC?

RESPONSE: BellSouth is still investigating this response.

REQUEST: How many technicians in Tennessee performing xDSL provisioning are design techs trained in xDSL? Are there any other techs trained in xDSL? If so, how many of those technicians are performing xDSL provisioning? How many contract technicians are performing xDSL provisioning in Tennessee? What training, if any, do contract technicians receive regarding xDSL?

RESPONSE: There are 79 technicians trained and profiled as xDSL qualified in Tennessee. There are five contractors trained and profiled as xDSL qualified in Tennessee. No technicians or contractors are currently in training. Contractor training is performed in house using BellSouth job aids. BellSouth technician training is performed at BellSouth training centers and via Computer Based Training.

REQUEST: What percentage of the time does BellSouth meet its cooperative acceptance testing (with coordinated installation) commitments on time for CLECs? To the extent that BellSouth performs an acceptance testing process for its retail consumers, what percentage of the time does BellSouth meet is retail testing commitments?

RESPONSE: The percentage of the time does BellSouth meet its cooperative acceptance testing (with coordinated installation) commitments on time for CLECs in TN for June is 97.2% and for July is 99.66%. BellSouth does not measure coordinated installations or an acceptance testing process for its retail consumers.

REQUEST: What is the difference in price between a two-wire non-load loop and an ADSL-capable loop in Tennessee?

RESPONSE:

TENNESSEE

			Recurring		Non-Rec 1st		Non-Rec add'l
ADSL compatible loop without man Svc Inquiry	zone 1	$	13.82	$	270.01	$	234.63
	zone 2	$	18.05	$	270.01	$	234.63
	zone 3	$	23.60	$	270.01	$	234.63
Unbundled Copper Loop - Non-Design (UCL-ND)	zone 1	$	13.19	$	31.99	$	20.02
	zone 2	$	17.23	$	31.99	$	20.02
	zone 3	$	22.53	$	31.99	$	20.02
Differences							
ADSL w/o man Svc Inquiry **vs** UCL-ND	zone 1	$	0.63	$	238.02	$	214.61
	zone 2	$	0.82	$	238.02	$	214.61
	zone 3	$	1.07	$	238.02	$	214.61

REQUEST: Provide copies of all complaints, verbal or written, filed by competing carriers concerning problems with BellSouth's OSS including the LCSC and LENs since January 1, 2000.

RESPONSE: BellSouth objects to producing confidential letters of CLECs to BellSouth. BellSouth also objects to this request as overbroad. Further, BellSouth has objected to providing information concerning communications between BellSouth and CLECs. Complaints from CLECs, if they existed and could be recovered, would generally contain information proprietary to that CLEC, i.e. customer-specific information. Presumably CLECs have copies of their own complaints and BellSouth's responses.