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OFFICE OF THE
EXECUTIVE SECRETARY
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November 28, 2001

VIA HAND DELIVERY

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

Re: *Petition of MCI WorldCom to Enforce Interconnection Agreement with BellSouth*
Docket No. 99-00662

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of BellSouth's responses to the Staff's November 14, 2001 Data Request, with the exception of the response to Item No. 8. The documents responsive to this request are proprietary in nature and will be furnished upon entry of an appropriate protective order. A copy of the enclosed has been provided to counsel of record.

Cordially

Joelle Phillips

JP/jej

Enclosure

REQUEST: Using the May, 2001 total on the spreadsheet provided by BellSouth as Exhibit RM-1 of Rebuttal Testimony of Richard McIntire, hereinafter referred to as ("Spreadsheet"), please provide the Authority with a usage measurement report in Excel format detailing BellSouth's originating traffic terminated on MCI's network in Tennessee.

- Please provide sorted by day, then by Originating NPA/NXX/XXXX order, all calls originating from BellSouth and terminating on MCI's network for the month of May 2001.
- Subtotal each NPA/NXX and at the end of each day and total at the end of the month.
- The report should be provided in the following column format:

	Originating Location	Terminating Location	Minutes			
Date	NPA/NXX/XXXX County	NPA/NXX/XXXX County	of Use	Rate	Revenue	

RESPONSE: BellSouth does not have this data in the exact format requested. BellSouth only maintains call details for sixty days because of the large volume of daily records (approximately 350 million call records daily). Maintaining the data in any active format would add substantial cost to the billing process without providing any benefit to BellSouth or its customers. As a surrogate BellSouth maintains summary records, generated from the actual call details, of usage online at a terminating NPA/NXX level for each company for a period of one year.

In an effort to provide a response to this request, BellSouth is providing this data on the basis described above. This data is provided in an EXCEL spreadsheet format, attached. Attachment One shows the daily data by terminating NPA/NXX, and Attachment Two shows a summary of the daily totals including a grand total.

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STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/1/2001	404479			2		0	2	2
TENNESSEE	7229	MCI METRO	5/1/2001	404836		5	7		5	7	12
TENNESSEE	7229	MCI METRO	5/1/2001	678202		1	1		1	1	2
TENNESSEE	7229	MCI METRO	5/1/2001	901248		1,191,685	8,324	38	1,191,723	8,286	1,200,009
TENNESSEE	7229	MCI METRO	5/1/2001	901251		735,464	18,838	18,787	754,251	51	754,302
TENNESSEE	7229	MCI METRO	5/1/2001	901252		11,379	113	165	11,544	-52	11,492
TENNESSEE	7229	MCI METRO	5/1/2001	901290		174	28		174	28	202
TENNESSEE	7229	MCI METRO	5/1/2001	901291		20,352	1,285	314	20,666	971	21,637
TENNESSEE	7229	MCI METRO	5/1/2001	901860		1,449	29	4	1,453	25	1,478
TENNESSEE	7229	MCI METRO	5/1/2001			1,960,509	28,627	19,308	1,979,817	9,319	1,989,136
TENNESSEE	7229	MCI METRO	5/2/2001	404836		1	1		1	1	2
TENNESSEE	7229	MCI METRO	5/2/2001	770280			1		0	1	1
TENNESSEE	7229	MCI METRO	5/2/2001	770284			3		0	3	3
TENNESSEE	7229	MCI METRO	5/2/2001	901248		1,143,200	5,506	21	1,143,221	5,485	1,148,706
TENNESSEE	7229	MCI METRO	5/2/2001	901251		703,214	18,938	18,751	721,965	187	722,152
TENNESSEE	7229	MCI METRO	5/2/2001	901252		14,675	91	69	14,744	22	14,766
TENNESSEE	7229	MCI METRO	5/2/2001	901290		157	25		157	25	182
TENNESSEE	7229	MCI METRO	5/2/2001	901291		8,722	984	145	8,868	838	9,706
TENNESSEE	7229	MCI METRO	5/2/2001	901860		1,821	30	4	1,825	26	1,851
TENNESSEE	7229	MCI METRO	5/2/2001			1,871,790	25,579	18,991	1,890,781	6,588	1,897,369
TENNESSEE	7229	MCI METRO	5/3/2001	404479		1	1		1	1	2
TENNESSEE	7229	MCI METRO	5/3/2001	404836		7	10		7	10	17
TENNESSEE	7229	MCI METRO	5/3/2001	678202		2	9		2	9	11
TENNESSEE	7229	MCI METRO	5/3/2001	770290		14	14		14	14	28

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STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/3/2001	901248	1,197,366	7,239	1,204,605	11	1,197,377	7,228	1,204,605
TENNESSEE	7229	MCI METRO	5/3/2001	901251	712,708	20,158	732,866	20,073	732,781	85	732,866
TENNESSEE	7229	MCI METRO	5/3/2001	901252	10,540	87	10,627	75	10,615	12	10,627
TENNESSEE	7229	MCI METRO	5/3/2001	901290	145	14	159		145	14	159
TENNESSEE	7229	MCI METRO	5/3/2001	901291	7,955	975	8,930	185	8,140	790	8,930
TENNESSEE	7229	MCI METRO	5/3/2001	901860	1,682	27	1,709	6	1,688	21	1,709
		Total for the date	5/3/2001		1,930,420	28,534	1,958,954	20,350	1,950,770	8,184	1,958,954
TENNESSEE	7229	MCI METRO	5/4/2001	404439		1	1			0	1
TENNESSEE	7229	MCI METRO	5/4/2001	404836		1	1			0	1
TENNESSEE	7229	MCI METRO	5/4/2001	901248	1,122,539	6,583	1,129,122	35	1,122,574	6,548	1,129,122
TENNESSEE	7229	MCI METRO	5/4/2001	901251	664,789	20,244	685,033	20,197	684,986	47	685,033
TENNESSEE	7229	MCI METRO	5/4/2001	901252	11,107	91	11,198	46	11,153	45	11,198
TENNESSEE	7229	MCI METRO	5/4/2001	901290	207	1	208		207	1	208
TENNESSEE	7229	MCI METRO	5/4/2001	901291	19,555	972	20,527	133	19,688	839	20,527
TENNESSEE	7229	MCI METRO	5/4/2001	901860	1,782	28	1,810	25	1,807	3	1,810
		Total for the date	5/4/2001		1,819,979	27,921	1,847,900	20,436	1,840,415	7,485	1,847,900
TENNESSEE	7229	MCI METRO	5/5/2001	901248	1,114,269	7,073	1,121,342		1,114,269	7,073	1,121,342
TENNESSEE	7229	MCI METRO	5/5/2001	901251	704,472	17,785	722,257	17,722	722,194	63	722,257
TENNESSEE	7229	MCI METRO	5/5/2001	901252	3,969	71	4,040	71	4,040	0	4,040
TENNESSEE	7229	MCI METRO	5/5/2001	901290	2		2				2
TENNESSEE	7229	MCI METRO	5/5/2001	901291	7,469	8	7,477	3	7,472	5	7,477
TENNESSEE	7229	MCI METRO	5/5/2001	901860	400	3	403		400	3	403
		Total for the date	5/5/2001		1,830,581	24,940	1,855,521	17,796	1,848,377	7,144	1,855,521

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TENNESSEE	7229	MCI METRO	5/6/2001	901248	1,183,019	7,109	1,190,128	1	1,183,020	7,108	1,190,128
TENNESSEE	7229	MCI METRO	5/6/2001	901251	760,213	20,749	780,962	20,359	780,572	390	780,962
TENNESSEE	7229	MCI METRO	5/6/2001	901252	2,605	111	2,716	112	2,717	-1	2,716
TENNESSEE	7229	MCI METRO	5/6/2001	901291	9,300	10	9,310	3	9,303	7	9,310
TENNESSEE	7229	MCI METRO	5/6/2001	901860	165		165		165	0	165
	Total for the date		5/6/2001		1,955,302	27,979	1,983,281	20,475	1,975,777	7,504	1,983,281
TENNESSEE	7229	MCI METRO	5/7/2001	901248	1,384,241	8,500	1,392,741	54	1,384,295	8,446	1,392,741
TENNESSEE	7229	MCI METRO	5/7/2001	901251	807,966	21,167	829,133	20,992	828,958	175	829,133
TENNESSEE	7229	MCI METRO	5/7/2001	901252	13,546	135	13,681	116	13,662	19	13,681
TENNESSEE	7229	MCI METRO	5/7/2001	901290	147		147		147	0	147
TENNESSEE	7229	MCI METRO	5/7/2001	901291	9,552	1,107	10,659	240	9,792	867	10,659
TENNESSEE	7229	MCI METRO	5/7/2001	901860	1,757	52	1,809	35	1,792	17	1,809
TENNESSEE	7229	MCI METRO	5/7/2001	954281		5	5		0	5	5
	Total for the date		5/7/2001		2,217,209	30,966	2,248,175	21,437	2,238,646	9,529	2,248,175
TENNESSEE	7229	MCI METRO	5/8/2001	770779		2	2		0	2	2
TENNESSEE	7229	MCI METRO	5/8/2001	901248	1,313,919	9,305	1,323,224	40	1,313,959	9,265	1,323,224
TENNESSEE	7229	MCI METRO	5/8/2001	901251	772,408	22,989	795,397	22,786	795,194	203	795,397
TENNESSEE	7229	MCI METRO	5/8/2001	901252	11,591	121	11,712	98	11,689	23	11,712
TENNESSEE	7229	MCI METRO	5/8/2001	901290	258	17	275		258	17	275
TENNESSEE	7229	MCI METRO	5/8/2001	901291	16,520	1,182	17,702	137	16,657	1,045	17,702
TENNESSEE	7229	MCI METRO	5/8/2001	901860	1,779	16	1,795	10	1,789	6	1,795
	Total for the date		5/8/2001		2,116,475	33,632	2,150,107	23,071	2,139,546	10,561	2,150,107

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TENNESSEE	7229	MCI METRO	5/9/2001	305925	1	1	2		1	1	2
TENNESSEE	7229	MCI METRO	5/9/2001	407670		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/9/2001	678202		6	6		0	6	6
TENNESSEE	7229	MCI METRO	5/9/2001	770284		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/9/2001	770291	1	1	2		1	1	2
TENNESSEE	7229	MCI METRO	5/9/2001	770779		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/9/2001	901248	1,302,696	9,829	1,312,525	98	1,302,794	9,731	1,312,525
TENNESSEE	7229	MCI METRO	5/9/2001	901251	768,928	22,898	791,826	22,586	791,514	312	791,826
TENNESSEE	7229	MCI METRO	5/9/2001	901252	12,740	102	12,842	108	12,848	-6	12,842
TENNESSEE	7229	MCI METRO	5/9/2001	901290	120	20	140		120	20	140
TENNESSEE	7229	MCI METRO	5/9/2001	901291	10,600	981	11,581	288	10,888	693	11,581
TENNESSEE	7229	MCI METRO	5/9/2001	901860	1,649	9	1,658	1	1,650	8	1,658
TENNESSEE	7229	MCI METRO	5/9/2001	919377		1	1		0	1	1
	Total for the date		5/9/2001		2,096,735	33,851	2,130,586	23,081	2,119,816	10,770	2,130,586
TENNESSEE	7229	MCI METRO	5/10/2001	407670		4	4		0	4	4
TENNESSEE	7229	MCI METRO	5/10/2001	770280		7	7		0	7	7
TENNESSEE	7229	MCI METRO	5/10/2001	770290	1	1	2		1	1	2
TENNESSEE	7229	MCI METRO	5/10/2001	901248	1,242,117	7,964	1,250,081	78	1,242,195	7,886	1,250,081
TENNESSEE	7229	MCI METRO	5/10/2001	901251	764,042	27,075	791,117	25,891	789,933	1,184	791,117
TENNESSEE	7229	MCI METRO	5/10/2001	901252	13,469	165	13,634	145	13,615	19	13,634
TENNESSEE	7229	MCI METRO	5/10/2001	901290	168	8	176		168	8	176
TENNESSEE	7229	MCI METRO	5/10/2001	901291	11,085	1,126	12,211	154	11,239	972	12,211
TENNESSEE	7229	MCI METRO	5/10/2001	901860	1,967	9	1,976	7	1,974	2	1,976
TENNESSEE	7229	MCI METRO	5/10/2001	919377		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/10/2001	919381		7	7		0	7	7
	Total for the date		5/10/2001		2,032,849	36,367	2,069,216	26,276	2,059,125	10,091	2,069,216

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TENNESSEE	7229	MCI METRO	5/11/2001	404836		4	4		0	4	4
TENNESSEE	7229	MCI METRO	5/11/2001	678202		3	3		0	3	3
TENNESSEE	7229	MCI METRO	5/11/2001	770280	7	8	15		7	8	15
TENNESSEE	7229	MCI METRO	5/11/2001	770281		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/11/2001	901248		7,312	1,220,804	48	1,213,540	7,264	1,220,804
TENNESSEE	7229	MCI METRO	5/11/2001	901251		23,866	744,411	21,690	742,235	2,176	744,411
TENNESSEE	7229	MCI METRO	5/11/2001	901252		107	14,187	98	14,178	9	14,187
TENNESSEE	7229	MCI METRO	5/11/2001	901290		13	157		144	13	157
TENNESSEE	7229	MCI METRO	5/11/2001	901291		908	13,680	201	12,973	707	13,680
TENNESSEE	7229	MCI METRO	5/11/2001	901860		9	1,684	2	1,677	7	1,684
TENNESSEE	7229	MCI METRO	5/11/2001	919325		5	5		0	5	5
TENNESSEE	7229	MCI METRO	5/11/2001	954233		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/11/2001	954377		1	1		0	1	1
		Total for the date	5/11/2001		1,962,715	32,238	1,994,953	22,039	1,984,754	10,199	1,994,953
TENNESSEE	7229	MCI METRO	5/12/2001	901248					1,105,083	6,819	1,111,902
TENNESSEE	7229	MCI METRO	5/12/2001	901251		6,823	1,111,902	4	698,066	440	698,506
TENNESSEE	7229	MCI METRO	5/12/2001	901252		15,954	698,506	15,514	3,401	-4	3,397
TENNESSEE	7229	MCI METRO	5/12/2001	901290		4	3,397	8	10	0	10
TENNESSEE	7229	MCI METRO	5/12/2001	901291		3	11,934		11,931	3	11,934
TENNESSEE	7229	MCI METRO	5/12/2001	901860		11	591		580	11	591
		Total for the date	5/12/2001		1,803,545	22,795	1,826,340	15,526	1,819,071	7,269	1,826,340
TENNESSEE	7229	MCI METRO	5/13/2001	901248					1,103,612	7,355	1,110,967
TENNESSEE	7229	MCI METRO	5/13/2001	901251		7,355	1,110,967		745,724	1,421	747,145
TENNESSEE	7229	MCI METRO	5/13/2001	901252		21,486	747,145	20,065	1,896	6	1,902

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TENNESSEE	7229	MCI METRO	5/13/2001	901291	6,746	11	6,757		6,746	11	6,757
TENNESSEE	7229	MCI METRO	5/13/2001	901860	106	4	110	1	107	3	110
	Total for the date		5/13/2001		1,838,002	28,879	1,866,881	20,083	1,858,085	8,796	1,866,881
TENNESSEE	7229	MCI METRO	5/14/2001	561237		1	1				
TENNESSEE	7229	MCI METRO	5/14/2001	678226	8	8	16				
TENNESSEE	7229	MCI METRO	5/14/2001	770280	1	12	13				
TENNESSEE	7229	MCI METRO	5/14/2001	901248	1,302,823	9,468	1,312,291	99	1,302,922	9,369	1,312,291
TENNESSEE	7229	MCI METRO	5/14/2001	901251	799,051	22,846	821,897	22,383	821,434	463	821,897
TENNESSEE	7229	MCI METRO	5/14/2001	901252	17,626	132	17,758	86	17,712	46	17,758
TENNESSEE	7229	MCI METRO	5/14/2001	901290	196	16	212		196	16	212
TENNESSEE	7229	MCI METRO	5/14/2001	901291	9,322	1,336	10,658	204	9,526	1,132	10,658
TENNESSEE	7229	MCI METRO	5/14/2001	901860	1,842	43	1,885	25	1,867	18	1,885
TENNESSEE	7229	MCI METRO	5/14/2001	919377		3	3		0	3	3
	Total for the date		5/14/2001		2,130,869	33,865	2,164,734	22,797	2,153,666	11,068	2,164,734
TENNESSEE	7229	MCI METRO	5/15/2001	561237		1	1				
TENNESSEE	7229	MCI METRO	5/15/2001	678202		2	2				
TENNESSEE	7229	MCI METRO	5/15/2001	770280	1	1	2				
TENNESSEE	7229	MCI METRO	5/15/2001	901248	1,294,834	9,211	1,304,045	56	1,294,890	9,155	1,304,045
TENNESSEE	7229	MCI METRO	5/15/2001	901251	767,896	22,926	790,822	22,174	790,070	752	790,822
TENNESSEE	7229	MCI METRO	5/15/2001	901252	12,733	76	12,809	72	12,805	4	12,809
TENNESSEE	7229	MCI METRO	5/15/2001	901290	198	33	231		198	33	231
TENNESSEE	7229	MCI METRO	5/15/2001	901291	15,680	1,070	16,750	154	15,834	916	16,750
TENNESSEE	7229	MCI METRO	5/15/2001	901860	1,916	19	1,935	18	1,934	1	1,935
	Total for the date		5/15/2001		2,093,258	33,339	2,126,597	22,474	2,115,732	10,865	2,126,597

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TENNESSEE	7229	MCI METRO	5/16/2001	770626			1	1	0	1	1
TENNESSEE	7229	MCI METRO	5/16/2001	901248	1,248,645	8,022	1,256,667	77	1,248,722	7,945	1,256,667
TENNESSEE	7229	MCI METRO	5/16/2001	901251	747,476	23,462	770,938	22,820	770,296	642	770,938
TENNESSEE	7229	MCI METRO	5/16/2001	901252	11,531	92	11,623	110	11,641	-18	11,623
TENNESSEE	7229	MCI METRO	5/16/2001	901290	182	13	195		182	13	195
TENNESSEE	7229	MCI METRO	5/16/2001	901291	12,033	1,003	13,036	159	12,192	844	13,036
TENNESSEE	7229	MCI METRO	5/16/2001	901860	1,668	46	1,714	17	1,685	29	1,714
TENNESSEE	7229	MCI METRO	5/16/2001	919325		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/16/2001	954377		4	4		0	4	4
	Total for the date		5/16/2001		2,021,535	32,644	2,054,179	23,183	2,044,718	9,461	2,054,179
TENNESSEE	7229	MCI METRO	5/17/2001	678202		4	4		0	4	4
TENNESSEE	7229	MCI METRO	5/17/2001	678256		2	2		0	2	2
TENNESSEE	7229	MCI METRO	5/17/2001	901248	1,222,292	9,013	1,231,305	37	1,222,329	8,976	1,231,305
TENNESSEE	7229	MCI METRO	5/17/2001	901251	718,050	19,746	737,796	18,969	737,019	777	737,796
TENNESSEE	7229	MCI METRO	5/17/2001	901252	12,279	78	12,357	84	12,363	-6	12,357
TENNESSEE	7229	MCI METRO	5/17/2001	901290	345	24	369		345	24	369
TENNESSEE	7229	MCI METRO	5/17/2001	901291	9,816	1,104	10,920	137	9,953	967	10,920
TENNESSEE	7229	MCI METRO	5/17/2001	901860	1,634	30	1,664	23	1,657	7	1,664
TENNESSEE	7229	MCI METRO	5/17/2001	954281		11	11		0	11	11
TENNESSEE	7229	MCI METRO	5/17/2001	954377		4	4		0	4	4
	Total for the date		5/17/2001		1,964,416	30,016	1,994,432	19,250	1,983,666	10,766	1,994,432
TENNESSEE	7229	MCI METRO	5/18/2001	305521		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/18/2001	678202		1	1		0	1	1

STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/18/2001	678226	7	7	14			7	14
TENNESSEE	7229	MCI METRO	5/18/2001	770280	8	10	18			8	18
TENNESSEE	7229	MCI METRO	5/18/2001	770281		1	1			0	1
TENNESSEE	7229	MCI METRO	5/18/2001	901248	1,173,742	7,776	1,181,518	39	1,173,781	7,737	1,181,518
TENNESSEE	7229	MCI METRO	5/18/2001	901251	672,147	16,870	689,017	16,406	688,553	464	689,017
TENNESSEE	7229	MCI METRO	5/18/2001	901252	13,320	47	13,367	23	13,343	24	13,367
TENNESSEE	7229	MCI METRO	5/18/2001	901290	225	13	238		225	13	238
TENNESSEE	7229	MCI METRO	5/18/2001	901291	13,558	934	14,492	234	13,792	700	14,492
TENNESSEE	7229	MCI METRO	5/18/2001	901860	1,686	35	1,721	9	1,695	26	1,721
TENNESSEE	7229	MCI METRO	5/18/2001	919325		3	3		0	3	3
	Total for the date	5/18/2001			1,874,693	25,698	1,900,391	16,711	1,891,404	8,987	1,900,391
TENNESSEE	7229	MCI METRO	5/19/2001	901248	1,116,372	6,970	1,123,342	5	1,116,377	6,965	1,123,342
TENNESSEE	7229	MCI METRO	5/19/2001	901251	724,075	19,001	743,076	18,405	742,480	596	743,076
TENNESSEE	7229	MCI METRO	5/19/2001	901252	2,083	30	2,113	30	2,113	0	2,113
TENNESSEE	7229	MCI METRO	5/19/2001	901290	69	1	70		69	1	70
TENNESSEE	7229	MCI METRO	5/19/2001	901291	5,681	44	5,725	39	5,720	5	5,725
TENNESSEE	7229	MCI METRO	5/19/2001	901860	462	15	477		462	15	477
	Total for the date	5/19/2001			1,848,742	26,061	1,874,803	18,479	1,867,221	7,582	1,874,803
TENNESSEE	7229	MCI METRO	5/20/2001	901248	1,154,343	7,933	1,162,276		1,154,343	7,933	1,162,276
TENNESSEE	7229	MCI METRO	5/20/2001	901251	740,806	22,175	762,981	21,410	762,216	765	762,981
TENNESSEE	7229	MCI METRO	5/20/2001	901252	2,778	10	2,788	11	2,789	-1	2,788
TENNESSEE	7229	MCI METRO	5/20/2001	901290	1		1		1	0	1

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TENNESSEE	7229	MCI METRO	5/20/2001	901291	6,383	8	6,391		6,383	8	6,391
TENNESSEE	7229	MCI METRO	5/20/2001	901860	156		156		156	0	156
	Total for the date		5/20/2001		1,904,467	30,126	1,934,593	21,421	1,925,888	8,705	1,934,593
TENNESSEE	7229	MCI METRO	5/21/2001	305521			2			0	2
TENNESSEE	7229	MCI METRO	5/21/2001	305925	2	2	4			2	4
TENNESSEE	7229	MCI METRO	5/21/2001	404836	3	8	11			3	11
TENNESSEE	7229	MCI METRO	5/21/2001	561237		1	1			0	1
TENNESSEE	7229	MCI METRO	5/21/2001	678202		4	4			0	4
TENNESSEE	7229	MCI METRO	5/21/2001	770280	7	9	16			7	16
TENNESSEE	7229	MCI METRO	5/21/2001	901248	1,374,980	8,376	1,383,356	74	1,375,054	8,302	1,383,356
TENNESSEE	7229	MCI METRO	5/21/2001	901251	798,700	23,155	821,855	22,195	820,895	960	821,855
TENNESSEE	7229	MCI METRO	5/21/2001	901252	13,275	125	13,400	89	13,364	36	13,400
TENNESSEE	7229	MCI METRO	5/21/2001	901290	203	44	247		203	44	247
TENNESSEE	7229	MCI METRO	5/21/2001	901291	9,239	896	10,135	176	9,415	720	10,135
TENNESSEE	7229	MCI METRO	5/21/2001	901860	1,872	8	1,880	3	1,875	5	1,880
	Total for the date		5/21/2001		2,198,281	32,630	2,230,911	22,537	2,220,818	10,093	2,230,911
TENNESSEE	7229	MCI METRO	5/22/2001	404836		8	8			0	8
TENNESSEE	7229	MCI METRO	5/22/2001	678202		1	1			0	1
TENNESSEE	7229	MCI METRO	5/22/2001	678256		1	1			0	1
TENNESSEE	7229	MCI METRO	5/22/2001	901248	1,338,801	8,068	1,346,869	83	1,338,894	7,985	1,346,869
TENNESSEE	7229	MCI METRO	5/22/2001	901251	777,709	21,892	799,601	21,375	799,084	517	799,601
TENNESSEE	7229	MCI METRO	5/22/2001	901252	12,645	105	12,750	99	12,744	6	12,750
TENNESSEE	7229	MCI METRO	5/22/2001	901290	238	20	258		238	20	258
TENNESSEE	7229	MCI METRO	5/22/2001	901291	15,031	888	15,919	192	15,223	696	15,919

STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/22/2001	901860	1,944	13	1,957	7	1,951	6	1,957
	Total for the date		5/22/2001		2,146,368	30,996	2,177,364	21,756	2,168,124	9,240	2,177,364
TENNESSEE	7229	MCI METRO	5/23/2001	678202			5		0	5	5
TENNESSEE	7229	MCI METRO	5/23/2001	770280	1	2	3		1	2	3
TENNESSEE	7229	MCI METRO	5/23/2001	901248	1,242,529	6,238	1,248,767	65	1,242,594	6,173	1,248,767
TENNESSEE	7229	MCI METRO	5/23/2001	901251	733,085	23,227	756,312	22,631	755,716	596	756,312
TENNESSEE	7229	MCI METRO	5/23/2001	901252	14,931	101	15,032	102	15,033	-1	15,032
TENNESSEE	7229	MCI METRO	5/23/2001	901290	128	33	161		128	33	161
TENNESSEE	7229	MCI METRO	5/23/2001	901291	7,081	1,116	8,197	229	7,310	887	8,197
TENNESSEE	7229	MCI METRO	5/23/2001	901860	2,087	44	2,131	9	2,096	35	2,131
	Total for the date		5/23/2001		1,999,842	30,766	2,030,608	23,036	2,022,878	7,730	2,030,608
TENNESSEE	7229	MCI METRO	5/24/2001	404439	1	1	2		1	1	2
TENNESSEE	7229	MCI METRO	5/24/2001	770284		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/24/2001	901248	1,284,028	7,268	1,291,296	96	1,284,124	7,172	1,291,296
TENNESSEE	7229	MCI METRO	5/24/2001	901251	772,023	22,259	794,282	21,708	793,731	551	794,282
TENNESSEE	7229	MCI METRO	5/24/2001	901252	11,381	85	11,466	73	11,454	12	11,466
TENNESSEE	7229	MCI METRO	5/24/2001	901290	164	8	172		164	8	172
TENNESSEE	7229	MCI METRO	5/24/2001	901291	9,716	1,261	10,977	219	9,935	1,042	10,977
TENNESSEE	7229	MCI METRO	5/24/2001	901860	1,903	28	1,931	16	1,919	12	1,931
TENNESSEE	7229	MCI METRO	5/24/2001	919325		1	1		0	1	1
	Total for the date		5/24/2001		2,079,216	30,912	2,110,128	22,112	2,101,328	8,800	2,110,128
TENNESSEE	7229	MCI METRO	5/25/2001	404836		2	2		0	2	2
TENNESSEE	7229	MCI METRO	5/25/2001	770238		1	1		0	1	1

STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/25/2001	901248	1,167,742	6,692	1,174,434	76	1,167,818	6,616	1,174,434
TENNESSEE	7229	MCI METRO	5/25/2001	901251	672,548	21,313	693,861	20,746	693,294	567	693,861
TENNESSEE	7229	MCI METRO	5/25/2001	901252	13,254	116	13,370	124	13,378	-8	13,370
TENNESSEE	7229	MCI METRO	5/25/2001	901290	193	11	204		193	11	204
TENNESSEE	7229	MCI METRO	5/25/2001	901291	12,847	832	13,679	114	12,961	718	13,679
TENNESSEE	7229	MCI METRO	5/25/2001	901860	1,915	19	1,934	10	1,925	9	1,934
	Total for the date		5/25/2001		1,868,499	28,986	1,897,485	21,070	1,889,569	7,916	1,897,485
TENNESSEE	7229	MCI METRO	5/26/2001	901248	1,034,217	6,034	1,040,251	1	1,034,218	6,033	1,040,251
TENNESSEE	7229	MCI METRO	5/26/2001	901251	656,864	21,536	678,400	21,294	678,158	242	678,400
TENNESSEE	7229	MCI METRO	5/26/2001	901252	1,241	28	1,269	33	1,274	-5	1,269
TENNESSEE	7229	MCI METRO	5/26/2001	901290	22	4	26		22	4	26
TENNESSEE	7229	MCI METRO	5/26/2001	901291	11,497	13	11,510	9	11,506	4	11,510
TENNESSEE	7229	MCI METRO	5/26/2001	901860	616	10	626		616	10	626
	Total for the date		5/26/2001		1,704,457	27,625	1,732,082	21,337	1,725,794	6,288	1,732,082
TENNESSEE	7229	MCI METRO	5/27/2001	901248	1,078,059	5,481	1,083,540	2	1,078,061	5,479	1,083,540
TENNESSEE	7229	MCI METRO	5/27/2001	901251	676,423	21,409	697,832	21,137	697,560	272	697,832
TENNESSEE	7229	MCI METRO	5/27/2001	901252	1,312	4	1,316	4	1,316	0	1,316
TENNESSEE	7229	MCI METRO	5/27/2001	901290	5		5		5	0	5
TENNESSEE	7229	MCI METRO	5/27/2001	901291	3,054	3	3,057		3,054	3	3,057
TENNESSEE	7229	MCI METRO	5/27/2001	901860	73	2	75		73	2	75
	Total for the date		5/27/2001		1,758,926	26,899	1,785,825	21,143	1,780,069	5,756	1,785,825
TENNESSEE	7229	MCI METRO	5/28/2001	901248	1,313,102	7,736	1,320,838	1	1,313,103	7,735	1,320,838
TENNESSEE	7229	MCI METRO	5/28/2001	901251	817,773	25,143	842,916	24,635	842,408	508	842,916

STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/28/2001	901252	1,974	10	1,984	11	1,985	-1	1,984
TENNESSEE	7229	MCI METRO	5/28/2001	901290	2		2		2	0	2
TENNESSEE	7229	MCI METRO	5/28/2001	901291	8,378	3	8,381		8,378	3	8,381
TENNESSEE	7229	MCI METRO	5/28/2001	901860	584	5	589		584	5	589
	Total for the date		5/28/2001		2,141,813	32,897	2,174,710	24,647	2,166,460	8,250	2,174,710
TENNESSEE	7229	MCI METRO	5/29/2001	404836		16	16		0	16	16
TENNESSEE	7229	MCI METRO	5/29/2001	678202		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/29/2001	901248	1,374,704	5,591	1,380,295	42	1,374,746	5,549	1,380,295
TENNESSEE	7229	MCI METRO	5/29/2001	901251	828,663	25,071	853,734	24,678	853,341	393	853,734
TENNESSEE	7229	MCI METRO	5/29/2001	901252	13,318	157	13,475	164	13,482	-7	13,475
TENNESSEE	7229	MCI METRO	5/29/2001	901290	259	2	261		259	2	261
TENNESSEE	7229	MCI METRO	5/29/2001	901291	11,446	988	12,434	137	11,583	851	12,434
TENNESSEE	7229	MCI METRO	5/29/2001	901860	1,841	22	1,863	19	1,860	3	1,863
	Total for the date		5/29/2001		2,230,231	31,848	2,262,079	25,040	2,255,271	6,808	2,262,079
TENNESSEE	7229	MCI METRO	5/30/2001	404479	5	9	14		5	9	14
TENNESSEE	7229	MCI METRO	5/30/2001	404836		6	6		0	6	6
TENNESSEE	7229	MCI METRO	5/30/2001	770280		1	1		0	1	1
TENNESSEE	7229	MCI METRO	5/30/2001	901248	1,356,505	7,195	1,363,700	54	1,356,559	7,141	1,363,700
TENNESSEE	7229	MCI METRO	5/30/2001	901251	808,514	24,982	833,496	24,405	832,919	577	833,496
TENNESSEE	7229	MCI METRO	5/30/2001	901252	13,627	154	13,781	125	13,752	29	13,781
TENNESSEE	7229	MCI METRO	5/30/2001	901290	254	16	270		254	16	270
TENNESSEE	7229	MCI METRO	5/30/2001	901291	14,352	369	14,721	191	14,543	178	14,721
TENNESSEE	7229	MCI METRO	5/30/2001	901860	1,844	12	1,856	8	1,852	4	1,856
	Total for the date		5/30/2001		2,195,101	32,744	2,227,845	24,783	2,219,884	7,961	2,227,845

STATE	OCN	COMPANY	DATE	NPANXX	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
TENNESSEE	7229	MCI METRO	5/31/2001	305925	1	1	2		1	1	2
TENNESSEE	7229	MCI METRO	5/31/2001	404479		4	4		0	4	4
TENNESSEE	7229	MCI METRO	5/31/2001	404836		4	4		0	4	4
TENNESSEE	7229	MCI METRO	5/31/2001	770280		2	2		0	2	2
TENNESSEE	7229	MCI METRO	5/31/2001	901248	1,399,707	6,900	1,406,607	60	1,399,767	6,840	1,406,607
TENNESSEE	7229	MCI METRO	5/31/2001	901251	868,038	22,655	890,693	21,743	889,781	912	890,693
TENNESSEE	7229	MCI METRO	5/31/2001	901252	14,969	93	15,062	69	15,038	24	15,062
TENNESSEE	7229	MCI METRO	5/31/2001	901290	188	22	210		188	22	210
TENNESSEE	7229	MCI METRO	5/31/2001	901291	13,067	304	13,371	213	13,280	91	13,371
TENNESSEE	7229	MCI METRO	5/31/2001	901860	1,860	66	1,926	24	1,884	42	1,926
	Total for the date		5/31/2001		2,297,830	30,051	2,327,881	22,109	2,319,939	7,942	2,327,881

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	DATE	LOCAL MOU	INTRALATA MOU	Total Unadjusted MOU	CONVERTED MOU	ADJUSTED LOCAL MOU	ADJUSTED INTRALATA MOU	TOTAL ADJUSTED MOU
Total for the date	5/1/2001	1,960,509	28,627	1,989,136	19,308	1,979,817	9,319	1,989,136
Total for the date	5/2/2001	1,871,790	25,579	1,897,369	18,991	1,890,781	6,588	1,897,369
Total for the date	5/3/2001	1,930,420	28,534	1,958,954	20,350	1,950,770	8,184	1,958,954
Total for the date	5/4/2001	1,819,979	27,921	1,847,900	20,436	1,840,415	7,485	1,847,900
Total for the date	5/5/2001	1,830,581	24,940	1,855,521	17,796	1,848,377	7,144	1,855,521
Total for the date	5/6/2001	1,955,302	27,979	1,983,281	20,475	1,975,777	7,504	1,983,281
Total for the date	5/7/2001	2,217,209	30,966	2,248,175	21,437	2,238,646	9,529	2,248,175
Total for the date	5/8/2001	2,116,475	33,632	2,150,107	23,071	2,139,546	10,561	2,150,107
Total for the date	5/9/2001	2,096,735	33,851	2,130,586	23,081	2,119,816	10,770	2,130,586
Total for the date	5/10/2001	2,032,849	36,367	2,069,216	26,276	2,059,125	10,091	2,069,216
Total for the date	5/11/2001	1,962,715	32,238	1,994,953	22,039	1,984,754	10,199	1,994,953
Total for the date	5/12/2001	1,803,545	22,795	1,826,340	15,526	1,819,071	7,269	1,826,340
Total for the date	5/13/2001	1,838,002	28,879	1,866,881	20,083	1,858,085	8,796	1,866,881
Total for the date	5/14/2001	2,130,869	33,865	2,164,734	22,797	2,153,666	11,068	2,164,734
Total for the date	5/15/2001	2,093,258	33,339	2,126,597	22,474	2,115,732	10,865	2,126,597
Total for the date	5/16/2001	2,021,535	32,644	2,054,179	23,183	2,044,718	9,461	2,054,179
Total for the date	5/17/2001	1,964,416	30,016	1,994,432	19,250	1,983,666	10,766	1,994,432
Total for the date	5/18/2001	1,874,693	25,698	1,900,391	16,711	1,891,404	8,987	1,900,391
Total for the date	5/19/2001	1,848,742	26,061	1,874,803	18,479	1,867,221	7,582	1,874,803
Total for the date	5/20/2001	1,904,467	30,126	1,934,593	21,421	1,925,888	8,705	1,934,593
Total for the date	5/21/2001	2,198,281	32,630	2,230,911	22,537	2,220,818	10,093	2,230,911
Total for the date	5/22/2001	2,146,368	30,996	2,177,364	21,756	2,168,124	9,240	2,177,364
Total for the date	5/23/2001	1,999,842	30,766	2,030,608	23,036	2,022,878	7,730	2,030,608
Total for the date	5/24/2001	2,079,216	30,912	2,110,128	22,112	2,101,328	8,800	2,110,128
Total for the date	5/25/2001	1,868,499	28,986	1,897,485	21,070	1,889,569	7,916	1,897,485
Total for the date	5/26/2001	1,704,457	27,625	1,732,082	21,337	1,725,794	6,288	1,732,082
Total for the date	5/27/2001	1,758,926	26,899	1,785,825	21,143	1,780,069	5,756	1,785,825
Total for the date	5/28/2001	2,141,813	32,897	2,174,710	24,647	2,166,460	8,250	2,174,710
Total for the date	5/29/2001	2,230,231	31,848	2,262,079	25,040	2,255,271	6,808	2,262,079
Total for the date	5/30/2001	2,195,101	32,744	2,227,845	24,783	2,219,884	7,961	2,227,845
Total for the date	5/31/2001	2,297,830	30,051	2,327,881	22,109	2,319,939	7,942	2,327,881
Grand Total for May 2001		61,894,655	930,411	62,825,066	662,754	62,557,409	267,657	62,825,066

REQUEST: Pursuant to a letter e-mailed to Mr. Marcel Henry from Mr. Jerry Hendrix, dated July 16, 2001 (Attachment # of Direct Testimony of Dan Aronson), BellSouth adjusted the payment to MCI to reflect the correct PLU by \$3.5M as calculated by BellSouth. How did BellSouth calculate the \$3.5M? Please provide exact details of how the PLU percentage as well as the \$3.5 M were calculated. How many minutes were used in the calculation and at what rates? Submit a prepared spreadsheet for clarification with details by month that totals to the \$3.5M.

RESPONSE: The Spreadsheet provided by BellSouth as Exhibit RM-1 of Rebuttal testimony of Richard McIntire has the exact calculations to show the correct amount owed for the intraLATA minutes of use (MOUs) using the rates shown on the spreadsheet. The spreadsheet column "I" labeled BellSouth MOUs are the recorded minutes used in the calculations, column "J" labeled BellSouth PLU shows the PLU used by BellSouth in the calculation. Columns "M&N" show the local and intraLATA minutes derived from taking the BellSouth MOUs (column I) times the PLU (column J) and 1 minus the PLU respectively. For the period of invoices for 7/1/97 through 1/1/98 BellSouth had no recordings and BellSouth used MCI invoiced MOUs. The local MOUs from column "M" are multiplied times the local rate from column "K" and the result is the total local dollars due or column "O". The IntraLATA MOUs from column "N" are multiplied times the intraLATA rate from column "L" and the result is the total intraLATA dollars due or column "P".

An example of this calculation for the 6/10/2001 invoice for IntraLATA is as follows:

IntraLATA Charges: column "I"		62,825,063 MOUs
column "J"	X	(1- .998) 1 minus PLU
column "N"		125,650 IntraLATA MOUs
column "L"		0.061182 MCI IntraLATA Rate
column "P"		\$7,688 IntraLATA Dollars Due

RESPONSE (CONTINUED)

The total difference of the MCI IntraLATA and the BellSouth IntraLATA charges is \$3,044,960 as shown under the heading of " Differences Between Companies ". The \$3.5 million shown in the letter states that " This adjustment is approximately \$3.5 M." This spreadsheet shows the total actual calculations using the given factors.

REQUEST: MCI reported 68,635,549 of Intrastate usage and BellSouth reported 17,555,872 of IntraLATA MOU's on the spreadsheet. Explain the difference.

RESPONSE: The 17,555,872 BellSouth IntraLATA usage is calculated using the BellSouth total collected MOUs and the BellSouth provided PLU as shown on the spreadsheet under columns " M, J, & N ". This also includes the MCI invoiced usage from 4/1/97 through 1/1/98 where BellSouth had not collected data. BellSouth gathers the total MOUs originating from BellSouth users and terminating to MCI users and applies the quarterly PLU to verify the MCI invoiced numbers. The spreadsheet shows these calculations and results.

BellSouth cannot definitely state why MCI invoices the amounts it does, however BellSouth's research indicates MCI is invoicing for all traffic that transits BellSouth's tandem even though it is third party originated and 1101 records are passed to MCI for their third party billing. Also MCI does not have access to BellSouth billing records and they are charging extended local calling area calls as IntraLATA, which is incorrect. This appears to be the basis for the differences in the IntraLATA MOUs.

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REQUEST: Please provide a usage report in Excel format of intrastate MCI traffic for Tennessee in the following column format:

Date	Originating Location		Terminating Location		Minutes of Use	Rate	Revenue
	NPA/NXX/XXXX	County	NPA/NXX/XXXX	County			

This report should be provided in day order, then by originating NPA/NXX/XXXX number order. Subtotal the minutes by day and total at the minutes for the month of May, 2001 confirming that totals match that of the Spreadsheet.

RESPONSE: Please see response to Item No. 1. The IntraLATA data is shown as recorded as well as adjusted amounts.

REQUEST: How did BellSouth arrive at the number of IntraLATA minutes on the Spreadsheet. If PLU was used, provide calculations justifying the PLU used.

RESPONSE: BellSouth calculates the IntraLATA MOUs by multiplying the total MOUs BellSouth collects times 1 minus the PLU. On the spreadsheet it is shown as (column I X (1 - column J)) = IntraLATA MOUs

During the data gathering for response to the TRA Data Request, BellSouth has determined an error occurred in the PLU development for the 2nd Quarter, 2001 as reported to MCI. This resulted in the PLU changing from 99.8% to 99.6%. This will result in additional monies owed to MCI in the amount of \$ 15,387.15. Processing of this amount for payment, \$15,387.15, will be on November 28, 2001.

The development of the PLU is as follows: The raw usage is gathered on a terminating NPANXX basis. This is broken down into Local and IntraLATA usage using the previous quarters data. Then a separate run is done to determine the usage that is converted from intraLATA to local due to extended area service. This data is subtracted from the intraLATA and added to the local. A calculation is performed to generate the PLU factor for each Company on a State-by-State basis. (See below)

Example: All data is for the 1st Quarter, 2001 Actual calculations for MCI Metro

BST Local usage	194,470,099
BST IntraLATA Usage	2,669,594
Total BST Usage	197,139,693
IntraLATA MOU's converted to Local	1,965,940
Adj Total Local	196,436,039
Adj Total IntraLATA	703,654
Total MOU's	197,139,693
PLU=Adj Local/Total	99.6%

REQUEST: BellSouth deducted \$1,000,000 due to the difference of 166,000,000 in minutes of use as reported by BellSouth vs MCI. How did BellSouth calculate the \$1,000,000 in usage charges? Please provide an EXCEL spreadsheet containing details of calculation totaled by month.

RESPONSE: MCI's billing to BellSouth was based on MCI's use of the tandem rate of \$0.005 and its inclusion of \$166,000,000 minutes, both of which BellSouth disputes. In determining the correct amount to withhold due to the incorrect inclusion of \$166,000,000 minutes and the use of the tandem rate, BellSouth simply calculated the portion of MCI's billing resulting from 166,000,000 minutes at the tandem rate as reflected by the attached spreadsheet.

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Inv. Date	MCI INVOICED MOUs	BellSouth MOUs	Over Invoiced MOUs	BellSouth PLU	Local Rate	IntraLATA Rate	Local Dollars	IntraLATA Dollars	Total Dollars by Month
4/1/1997	191			0.750	0.0050000	0.061182			
5/1/1997	630			0.750	0.0050000	0.061182			
6/1/1997	20,195			0.750	0.0050000	0.061182			
7/1/1997	281,456			0.750	0.0050000	0.061182			
8/1/1997	432,773			0.750	0.0050000	0.061182			
9/1/1997	1,148,732			0.750	0.0050000	0.061182			
10/1/1997	1,298,798			0.750	0.0050000	0.061182			
11/1/1997	1,269,962			0.750	0.0050000	0.061182			
12/1/1997	1,693,677			0.750	0.0050000	0.061182			
1/1/1998	4,628,511			0.750	0.0050000	0.061182			
2/1/1998	4,449,831	2,217,023	2,232,808	0.750	0.0050000	0.061182	\$8,373	\$34,152	\$42,525
3/1/1998	3,199,855	2,674,622	525,233	0.750	0.0050000	0.061182	\$1,970	\$8,034	\$10,003
4/1/1998	3,636,051	3,316,434	319,617	0.750	0.0050000	0.061182	\$1,199	\$4,889	\$6,087
5/1/1998	4,355,061	4,010,586	344,475	0.950	0.0050000	0.061182	\$1,636	\$1,054	\$2,690
6/1/1998	7,897,921	5,593,278	2,304,643	0.950	0.0050000	0.061182	\$10,947	\$7,050	\$17,997
7/1/1998	7,889,872	6,630,219	1,259,653	0.950	0.0050000	0.061182	\$5,983	\$3,853	\$9,837
8/1/1998	8,865,847	7,756,052	1,109,795	0.974	0.0050000	0.061182	\$5,405	\$1,765	\$7,170
9/1/1998	11,202,804	9,029,218	2,173,586	0.974	0.0050000	0.061182	\$10,585	\$3,458	\$14,043
10/1/1998	12,886,863	10,385,142	2,501,721	0.974	0.0050000	0.061182	\$12,183	\$3,980	\$16,163
11/1/1998	12,183,107	10,991,714	1,191,393	0.983	0.0050000	0.061182	\$5,856	\$1,239	\$7,095
12/1/1998	14,317,021	12,325,590	1,991,431	0.983	0.0050000	0.061182	\$9,788	\$2,071	\$11,859
1/1/1999	14,266,744	12,719,471	1,547,273	0.983	0.0050000	0.061182	\$7,605	\$1,609	\$9,214
2/10/1999	19,081,815	14,346,441	4,735,374	0.897	0.0050000	0.061182	\$21,238	\$29,841	\$51,079
3/10/1999	14,817,157	13,180,461	1,636,696	0.897	0.0050000	0.061182	\$7,341	\$10,314	\$17,655
4/10/1999	17,496,535	15,296,079	2,200,456	0.897	0.0050000	0.061182	\$9,869	\$13,867	\$23,736
5/10/1999	14,538,291	14,830,114	-291,823	0.955	0.0050000	0.061182	-\$1,393	-\$803	-\$2,197
6/10/1999	19,940,329	14,893,922	5,046,407	0.955	0.0050000	0.061182	\$24,097	\$13,894	\$37,990
7/10/1999	17,940,442	16,004,709	1,935,733	0.955	0.0050000	0.061182	\$9,243	\$5,329	\$14,573
8/10/1999	19,054,427	19,115,136	-60,709	0.992	0.0050000	0.061182	-\$301	-\$30	-\$331
9/10/1999	18,416,630	18,281,861	134,769	0.992	0.0050000	0.061182	\$668	\$66	\$734
10/10/1999	15,799,302	13,834,222	1,965,080	0.992	0.0050000	0.061182	\$9,747	\$962	\$10,709
11/10/1999	21,043,596	16,878,703	4,164,893	0.989	0.0050000	0.061182	\$20,595	\$2,803	\$23,398
12/10/1999	34,122,069	28,523,421	5,598,648	0.989	0.0050000	0.061182	\$27,685	\$3,768	\$31,453
1/10/2000	39,673,777	34,054,688	5,619,089	0.989	0.0050000	0.061182	\$27,786	\$3,782	\$31,568
2/10/2000	51,092,911	42,245,837	8,847,074	0.992	0.0050000	0.061182	\$43,881	\$4,330	\$48,212
3/10/2000	55,564,072	46,863,249	8,700,823	0.992	0.0050000	0.061182	\$43,156	\$4,259	\$47,415

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Inv. Date	MCI INVOICED MOUs	BellSouth MOUs	Over Invoiced MOUs	BellSouth PLU	Local Rate	IntraLATA Rate	Local Dollars	IntraLATA Dollars	Total Dollars by Month
4/10/2000	59,013,380	48,863,958	10,149,422	0.992	0.0050000	0.061182	\$50,341	\$4,968	\$55,309
5/10/2000	55,211,313	46,110,241	9,101,072	0.998	0.0050000	0.061182	\$45,414	\$1,114	\$46,528
6/10/2000	57,792,752	50,179,503	7,613,249	0.998	0.0050000	0.061182	\$37,990	\$932	\$38,922
7/10/2000	68,920,668	57,816,673	11,103,995	0.998	0.0050000	0.061182	\$55,409	\$1,359	\$56,768
8/10/2000	70,592,735	59,572,872	11,019,863	0.997	0.0050000	0.061182	\$54,934	\$2,023	\$56,957
9/10/2000	65,270,233	55,259,362	10,010,871	0.997	0.0050000	0.061182	\$49,904	\$1,837	\$51,742
10/10/2000	60,982,059	51,542,453	9,439,606	0.997	0.0050000	0.061182	\$47,056	\$1,733	\$48,789
11/10/2000	69,194,548	59,682,768	9,511,780	0.998	0.0050000	0.061182	\$47,464	\$1,164	\$48,628
12/10/2000	64,438,158	60,475,895	3,962,263	0.998	0.0050000	0.061182	\$19,772	\$485	\$20,257
1/10/2001	68,487,053	65,222,665	3,264,388	0.998	0.0050000	0.061182	\$16,289	\$399	\$16,689
2/10/2001	76,007,656	71,770,964	4,236,692	0.999	0.0050000	0.061182	\$21,162	\$259	\$21,421
3/10/2001	66,773,378	64,414,270	2,359,108	0.999	0.0050000	0.061182	\$11,784	\$144	\$11,928
4/10/2001	71,962,193	69,130,220	2,831,973	0.999	0.0050000	0.061182	\$14,146	\$173	\$14,319
5/10/2001	65,934,766	62,715,187	3,219,579	0.996	0.0050000	0.061182	\$16,034	\$788	\$16,821
6/10/2001	63,831,297	62,825,063	1,006,234	0.996	0.0050000	0.061182	\$5,011	\$246	\$5,257
			166,564,233				\$817,853	\$183,159	\$1,001,011

REQUEST: Please provide an EXCEL spreadsheet supporting the calculation of the \$700,000 paid to MCI including the tariffed intraLATA rates used in the calculation of the payment, as discussed in the e-mail to Mr. Marcel Henry on July 16, 2001 from Jerry D. Hendrix. Please include minutes of use by month.

RESPONSE: The additional \$700,000 payment is the result of paying MCI at the MCI tariff rates in lieu of BellSouth tariff rates, the MOUs remained the same for both calculations. The attached spreadsheet labeled " BST INTRALATA RATES " shows the payments calculated using BellSouth rates (\$2,223,231) and the spreadsheet labeled " MCI INTRALATA RATES " shows the payments calculated at MCI tariff rates (\$2,935,939). The difference in the two spreadsheets is for the amount of \$712,708 or the amount due to the rate difference between MCI and BellSouth tariffs.

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Mentis Outstanding	BellSouth MOUs	BellSouth PLU	Local Rate	Interstate Rate	Total Local MOUs	Total Inland MOUs	Total Local \$	Total Inland \$	Amount Due	Interest	INTRA-STATE USAGE		LOCAL THROUGH		LOCAL REVENUE		INTER-STATE USAGE		LOCAL REVENUE		ADJUSTED BALANCE		ADJUSTED BALANCE	
											MOUs	\$	MOUs	\$	MOUs	\$	MOUs	\$	MOUs	\$	MOUs	\$	MOUs	\$
3.93	52	0.750	0.0040000	0.0611182	144.60	47	\$1	\$1	\$1	\$1	47	\$1	47	\$1	47	\$1	47	\$1	47	\$1	47	\$1	47	\$1
8.52	51	0.750	0.0040000	0.0611182	473	107	\$2	\$2	\$2	\$2	107	\$2	107	\$2	107	\$2	107	\$2	107	\$2	107	\$2	107	\$2
11.48	50	0.750	0.0040000	0.0611182	185	30	\$1	\$1	\$1	\$1	30	\$1	30	\$1	30	\$1	30	\$1	30	\$1	30	\$1	30	\$1
12.42	49	0.750	0.0040000	0.0611182	70.66	8.94	\$4	\$4	\$4	\$4	8.94	\$4	8.94	\$4	8.94	\$4	8.94	\$4	8.94	\$4	8.94	\$4	8.94	\$4
13.42	48	0.750	0.0040000	0.0611182	211.00	24.66	\$14	\$14	\$14	\$14	24.66	\$14	24.66	\$14	24.66	\$14	24.66	\$14	24.66	\$14	24.66	\$14	24.66	\$14
14.42	47	0.750	0.0040000	0.0611182	324.50	108.83	\$1.29	\$1.29	\$1.29	\$1.29	108.83	\$1.29	108.83	\$1.29	108.83	\$1.29	108.83	\$1.29	108.83	\$1.29	108.83	\$1.29	108.83	\$1.29
15.42	46	0.750	0.0040000	0.0611182	841.36	287.86	\$3.45	\$3.45	\$3.45	\$3.45	287.86	\$3.45	287.86	\$3.45	287.86	\$3.45	287.86	\$3.45	287.86	\$3.45	287.86	\$3.45	287.86	\$3.45
16.42	45	0.750	0.0040000	0.0611182	974.04	394.94	\$3.96	\$3.96	\$3.96	\$3.96	394.94	\$3.96	394.94	\$3.96	394.94	\$3.96	394.94	\$3.96	394.94	\$3.96	394.94	\$3.96	394.94	\$3.96
17.42	44	0.750	0.0040000	0.0611182	779.95	490.07	\$3.120	\$3.120	\$3.120	\$3.120	490.07	\$3.120	490.07	\$3.120	490.07	\$3.120	490.07	\$3.120	490.07	\$3.120	490.07	\$3.120	490.07	\$3.120
18.42	43	0.750	0.0040000	0.0611182	425.61	270.88	\$2.517	\$2.517	\$2.517	\$2.517	270.88	\$2.517	270.88	\$2.517	270.88	\$2.517	270.88	\$2.517	270.88	\$2.517	270.88	\$2.517	270.88	\$2.517
19.42	42	0.750	0.0040000	0.0611182	1,471.020	1,157.491	\$5.884	\$5.884	\$5.884	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884	1,157.491	\$5.884
20.42	41	0.750	0.0040000	0.0611182	2,470.665	1,662.767	\$5.526	\$5.526	\$5.526	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526	1,662.767	\$5.526
21.42	40	0.750	0.0040000	0.0611182	3,470.665	2,065.882	\$6.824	\$6.824	\$6.824	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824	2,065.882	\$6.824
22.42	39	0.750	0.0040000	0.0611182	4,470.665	2,829.109	\$9.949	\$9.949	\$9.949	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949	2,829.109	\$9.949
23.42	38	0.750	0.0040000	0.0611182	5,470.665	3,829.109	\$12.240	\$12.240	\$12.240	\$12.240	3,829.109	\$12.240</												

Differences between Companies

Local	1,274,799,339	1,390,283,895	\$2,410,354	\$5,506,620
Interstate	17,555,872	66,635,549	\$1,074,103	\$4,134,425
Total	1,292,355,211	1,456,919,444	\$3,504,457	\$9,641,045
Interest			\$449,569	\$1,184,504
Payments			(\$1,015,687)	(\$1,096,150)
Total Due			\$9,819,919	\$9,819,919
			\$2,935,939	

REQUEST: Please submit all customer numbers of BellSouth end-users, that "subscribe to an extended area plan" that are involved in this dispute. Please sort in NPA-NXX-XXXX numerical order.

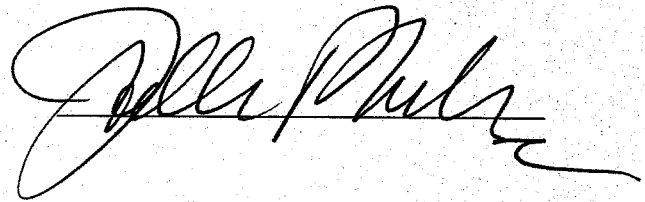
RESPONSE: The documents responsive to this request are proprietary in nature. BellSouth will produce documents responsive to this request upon entry of an appropriate protective order. An agreed protective order has been submitted by the parties.

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2001, a copy of the foregoing document was served on the parties of record, via the method indicated:

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

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Ave., #1600
P. O. Box 198062
Nashville, TN 37219-8062

A handwritten signature in black ink, appearing to read "John P. Walker", written over a horizontal line.