

region.” CLECs can obtain access to and combine unbundled network elements, for example unbundled local switching and unbundled loops, through the use of a collocation arrangement. Such combining of unbundled network elements by the CLEC may also include equipment or facilities which the CLEC provides for itself. BellSouth will extend unbundled network elements to a CLEC’s physical collocation arrangement and will terminate those unbundled network elements in such a way as to allow the CLEC to provide any cross connections or other required wiring within the collocation arrangement in order to effect the combination. As mentioned above, a CLEC might combine individual unbundled network elements such as an unbundled loop with an unbundled switch port. Both the loop and the switch port are normally terminated on the Main Distributing Frame (MDF) within the BellSouth central office. Upon request of the CLEC, BellSouth will wire the loop from the MDF to the CLEC’s collocation arrangement. BellSouth will also wire the switch port from the MDF to the collocation arrangement. The CLEC may then combine any unbundled loop it has acquired from BellSouth with any unbundled switch port it has acquired from BellSouth, subject to the technical parameters of the loop and the port. By technical parameters, I refer to the characteristics and functionality provided by given unbundled network elements. For example, a two-wire analog unbundled loop will normally be combined with a two-wire unbundled switch port. The CLEC is responsible for making any necessary cross connections within the physical collocation

arrangement. Other UNEs which the CLEC acquires from BellSouth may be combined by the CLEC in like manner.

14. AT&T claims that BellSouth refused to process AT&T's orders for 900 Number Blocking in Kentucky (Affidavit of James Tamplin on behalf of AT&T, page 36.) AT&T requested that BellSouth provide call blocking of 900 calls as a "stand alone" feature. BellSouth offers to block calls to 900 numbers and 976 numbers upon request of BellSouth's retail customers. BellSouth is not opposed to developing such a "stand alone" capability for blocking of only calls to 900 numbers, although work remains to be completed to determine a technical solution. On November 3, 1997, BellSouth offered AT&T an alternative way of providing the service it requested.

15. AT&T claims that BellSouth refused to process AT&T's orders for Call Hold in Kentucky (Affidavit of James Tamplin on behalf of AT&T, page 36.) Here again, AT&T requested that BellSouth provide Call Hold as a "stand alone" feature independent of the User Transfer feature. Unlike the issue of combining blocking of calls to 900 numbers and 976 numbers into a single feature, BellSouth believes that feature interactions between the Call Hold and User Transfer features must be examined in order to determine the technical feasibility of such a "stand alone" feature for Call Hold. It is important to note that feature interaction is a function of the switch software provided by the manufacturer. On November 3, 1997, BellSouth responded to AT&T's request by stating that AT&T could issue a Bona Fide Request for such a "stand alone" Call Hold feature capability. To date, AT&T has not made such a Bona Fide Request.

16. MCI claims that BellSouth does not offer trunk ports as a separate unbundled network element and that this prevents MCI from using unbundled local transport. (Affidavit of Marcel Henry on behalf of MCI, page 22.) Modern switching systems are highly complicated with many interrelated component parts. Many of these components, such as trunk ports, would provide no useful functionality by themselves. Therefore, defining new unbundled network elements such as “trunk ports” would serve no purpose whatsoever. Trunk ports have not been the subject of the arbitration process or the bona fide request process and are not required elements of the checklist.
17. AT&T claims that BellSouth is not providing or offering nondiscriminatory access to customized routing. (Affidavit of James Tamplin on behalf of AT&T, page 39.) In my original affidavit at paragraph 51, I discussed this topic. As yet, no CLEC in South Carolina has requested that BellSouth provide it with customized routing; BellSouth, however, has finalized work in Georgia to provide AT&T with customized routing. Despite BellSouth’s completing all required work, AT&T has yet to begin using the customized routing it requested.
18. AT&T is free to associate any class of service it provides with any of the line class codes it acquires from BellSouth. BellSouth simply requires that AT&T provide that information as part of the Local Service Request process. To date, AT&T has not provided such information. Thus, customized routing is available to AT&T; however, AT&T simply refuses to use the capability it requested and which BellSouth provided.
19. AT&T claims that BellSouth is not providing customized unbranded access to its operator services and directory assistance services.

(Affidavit of James Tamplin on behalf of AT&T, page 53.) BellSouth's selective routing capabilities, discussed above and in my original affidavit, allow a CLEC to route calls from its customers to the CLEC's operator services and directory assistance platforms. Alternatively, the CLEC can route those calls to BellSouth's operator services and directory assistance platforms where the calls can be branded with the CLEC's brand or left unbranded, whichever the CLEC elects.

20. ITC DeltaCom claims that BellSouth previously dropped CLEC customers from BellSouth's 911 database. (Affidavit of Steven Moses on behalf of ITC DeltaCom (ALTS), page 8.) BellSouth is aware of only one incident where CLEC customers were not included in the 911 database. This problem was caused by human error and was corrected when the CLEC made BellSouth aware of the problem. The problem has not since recurred.

21. MCI claims that BellSouth has not demonstrated that it can provide nondiscriminatory access to BellSouth's call related databases and associated signaling. (Affidavit of Marcel Henry on behalf of MCI, page 26.) I discussed this issue in my original affidavit beginning at paragraph 72. Mr. Henry seemingly ignores the millions of queries of BellSouth's call related databases which BellSouth has successfully handled for CLECs, interexchange carriers, and other incumbent local exchange carriers. In addition, BellSouth provides CLECs access to BellSouth's signaling network either directly or through third party service providers, whichever the CLEC elects. Both modes of access to BellSouth's signaling network are available for use today by CLECs, as my affidavit made clear.

22. AT&T claims that BellSouth is not providing customized routing using BellSouth's Advanced Intelligent Network (AIN) capabilities. (Affidavit of James Tamplin on behalf of AT&T, page 49.) As explained in paragraph 51 of my prior affidavit, development work continues on this method, and it is expected that a technical trial of this method will commence during December 1997. Until such time as this method becomes available, BellSouth provides customized routing through line class codes, as discussed above.
23. AT&T claims that BellSouth has not developed the capability to provide CLECs which acquired unbundled local switching from BellSouth with adequate usage and billing data for the unbundled network element local switching. (Affidavit of James Tamplin on behalf of AT&T, page 49.) In my original affidavit at paragraph 52, I stated that a bill for the monthly charges for the flat-rate priced (that is, non-traffic sensitive) components of unbundled local switching can be system generated at present. The usage charges for the traffic sensitive components of unbundled local switching, however, contain several components and can vary by distance and the number of switches involved in completing the call. On August 14, 1997, BellSouth changed its Customer Record Information System (CRIS) to allow the production of a "summary usage file" containing information regarding usage for unbundled local switching. The first production cycle for CLEC bills was September 25, 1997 and I am unaware of any complaints from any CLEC regarding the accuracy, format or content of these bills for unbundled local switching. Thus, BellSouth has demonstrated its capability to mechanically produce a bill for usage charges if a CLEC purchases unbundled switching from BellSouth.

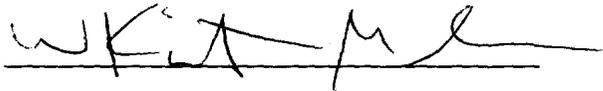
24. Teleport Communications Group (TCG) claims that BellSouth does not confirm Signaling System 7 (SS7) point code activations to TCG. (Comments of Teleport Communications Group, Inc., page 11.) BellSouth not only provides code point activation information but additional information which BellSouth believes is required to ensure that all required work has been completed to commence the use of interconnection trunks between a CLEC's network and BellSouth's network. BellSouth provided this information to TCG, specifically to Mr. Frank Hoffman of TCG, on August 20, 1997 via electronic mail.
25. MCI claims that BellSouth does not make SS7 available for use with the Automatic Call Return feature. (Affidavit of Marcel Henry on behalf of MCI, page 27.) Automatic Call Return does not use or require SS7 functionality to access an external database for call processing. My original affidavit at paragraph 76 discusses this at some length.
26. MCI claims that BellSouth requires CLECs to use SS7 to access BellSouth's 800 database. (Affidavit of Marcel Henry on behalf of MCI, page 27.) That is not correct. BellSouth provides three different types of access to its 800 database, which disproves Mr. Henry's claim. The first type allows access to the BellSouth toll free number database (which I will refer to as the "800 database") by a CLEC whose switches are not capable of supporting Signaling System 7 (SS7) protocols. I am not aware of any requests from CLECs for such access, and I would be surprised to hear of such a request given that the SS7 protocol has been used extensively for many years such that most or all modern switching systems are SS7 capable. However, should a CLEC make such a request, BellSouth would respond using the Bona Fide Request process.

27. The second type of access allows a CLEC whose switches are SS7 capable to attach those switches to BellSouth's Signal Transfer Points (STPs) and thence to the BellSouth 800 database. BellSouth offers such an option, which in Section X of BellSouth's Statement of Generally Available Terms and Conditions (SGAT) is referred to as the "A-Link" option.
28. The third option is for a CLEC whose switches are SS7 capable to attach those switches to a third party's STPs. These STPs would be attached to BellSouth's STPs and thence to BellSouth's 800 database. In Section X of BellSouth's SGAT, this option is referred to as the "B-Link" option.
29. Low Tech Designs claims that BellSouth has not provided it with access to the *11 abbreviated dialing code. (Comments of Low Tech Designs, page 6.) The Georgia Public Service Commission in Docket Number 7587-U found that Low Tech Designs had not demonstrated a right to obtain an abbreviated dialing code such as *XX (where * is the same labeled key on a telephone set and X is any digit from 0 to 9 inclusive.) Further, assignment of the type *XX code which Low Tech Designs seeks is not a matter between Low Tech Designs and BellSouth but rather a matter between Low Tech Designs and the North American Numbering Plan Administrator, Bell Communications Research, Inc. Regarding Low Tech Designs' earlier request to the Georgia Public Service Commission for the assignment of an "N11" code to Low Tech Designs (where N is any number between 1 and 9 inclusive), here again the Georgia Public Service Commission, rather than BellSouth, administers the assignment of these codes. Thus, the matter of assignment of such a code is a matter between Low Tech

Designs and the Georgia Public Service Commission rather than an issue between Low Tech Designs and BellSouth.

30. Teleport Communications Group (TCG) claims that BellSouth will not provide it with Carrier Identification Codes (CICs) served by BellSouth's tandems. (Comments of Teleport Communications Group, Inc., page 12.) BellSouth provides TCG with this information nonetheless. BellSouth believes that the most accurate way of obtaining the information TCG seeks is for BellSouth to provide TCG a list of Access Carrier Name Abbreviations (ACNAs) served by a given BellSouth tandem. Using this ACNA, TCG can refer to the Local Exchange Routing Guide (LERG) (which is published by Bell Communications Research, Inc. and subscribed to by TCG, among others) to determine CIC and other related information. This is the same process which BellSouth uses to inventory and identify CICs served by BellSouth's tandem switches. On September 17, 1997, BellSouth provided to Mr. Frank Hoffman of TCG, a list of interexchange carrier names, billing addresses, and ACNAs served by each of BellSouth's tandem switches in Florida.
31. Some parties have questioned why the end-to-end test results included in my original affidavit did not show the signature of all test participants. In most cases the product manager with day-to-day responsibilities for a given unbundled network element or resold service retained the original signature sheets as part of other test documentation. Those signature sheets for members of the end-to-end test team are attached to this affidavit as Exhibit WKM-1.

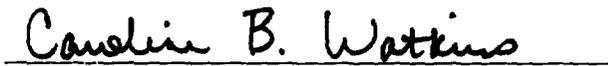
I hereby swear that the foregoing is true and correct to the best of my information and belief.



W. Keith Milner

Director-Interconnection Operations
BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 12th
day of November, 1997.



Notary Public

CAROLINE B. WATKINS
Notary Public, DeKalb County, Georgia
My Commission Expires January 19, 1998

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TAB 1

END-TO-END TEST RESULTS IMPLEMENTATION TEAM SIGN-OFF SHEET

Product/Service Unbundled Dark Fiber

END-TO-END TEST RESULTS:

Completion Date 03-31-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completi</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<u>Nancy Star</u>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<u>Ron Love</u>
RSOS	DONNA WARD	404 529-6112	<u>Donna W</u>

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DARK FIBER

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completion</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7208	<i>Ed Houppert</i>
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-6112	_____

<u>at</u> <u>Completion</u>	<u>Participants</u> <u>Name (Typed)</u>	<u>Telephone</u> <u>Number</u>	<u>Signature</u> <u>ETET</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network 	BILL MCALLISTER	205 977-2710	
Network	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

TAB 2

**END-TO-END TEST RESULTS
IMPLEMENTATION TEAM SIGN-OFF SHEET**

Product/Service Unbundled Interoffice Transport -Dedicated

END-TO-END TEST RESULTS

Completion Date 03-27-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Comple</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<u>Nancy St</u>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<u>Ron Love</u>
RSOS	DONNA WARD	404 529-6112	<u>Donna W</u>

3/31/97

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	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature & ETET Con.</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	<i>Curtis Swan</i>
ICS	BEVERLY SCARBROUGH	205 977-0111	<i>Beverly Scarbrough</i>
CBS	SALLY BELUE	205 321-4422	<i>Sally Belue</i>
Network	BILL MCALLISTER	205 977-2710	_____
Network <i>Operators</i> <i>C.P.G.</i>	BRIAN BLANCHARD	205 977-3064	<i>Brian Blanchard</i>
ACAC	ED HOUPPERT	404 529-7206	_____
<i>IT-CABS</i> <i>Comptrollers</i>	SUSAN FURLOW	205 985-8018	<i>Susan L. Furlow</i>
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-6112	_____

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UIT Dedicated

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completi</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	_____
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	<i>Ed Houppert</i>
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	_____
RSOS	DONNA WARD	404 529-5112	_____

3/28/97

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at <u>Completion</u>	Participants <u>Name (Typed)</u>	Telephone <u>Number</u>	Signature <u>ETET</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network	BILL MCALLISTER	205 977-2710	
Network	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

TAB 3

END-TO-END TEST RESULTS IMPLEMENTATION TEAM SIGN-OFF SHEET

Product/Service Unbundled Channelization, incld Channel Interface

END-TO-END TEST RESULTS

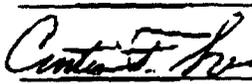
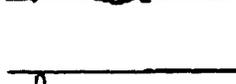
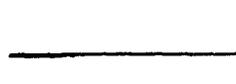
Completion Date 03-27-97

We the undersigned agree we have fully tested this product/service and are satisfied it is functional and ready for deployment.

	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Completi</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	<i>Nancy Starcher</i>
Project Mgmt.	CURTIS SWAN	205 444-524	_____
ICS	BEVERLY SCARBROUGH	205 977-0111	_____
CBS	SALLY BELUE	205 321-4422	_____
Network	BILL MCALLISTER	205 977-2710	_____
Network	BRIAN BLANCHARD	205 977-3064	_____
ACAC	ED HOUPPERT	404 529-7206	_____
Comptrollers	SUSAN FURLOW	205 985-8018	_____
RSOS	RON LOVE	404 529-5822	<i>Ron Love</i>
RSOS	DONNA WARD	404 529-6112	<i>Donna W</i>

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	<u>Participants Name (Typed)</u>	<u>Telephone Number</u>	<u>Signature at ETET Comple</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network	BILL MCALLISTER	205 977-2710	
Network Operations CPG	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
IT-CABS Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	

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at <u>Completion</u>	Participants <u>Name (Typed)</u>	Telephone <u>Number</u>	Signature <u>ETET</u>
Product Mgmt.	NANCY STARCHER	404 927-7501	
Project Mgmt.	CURTIS SWAN	205 444-524	
ICS	BEVERLY SCARBROUGH	205 977-0111	
CBS	SALLY BELUE	205 321-4422	
Network	BILL MCALLISTER	205 977-2710	
Network	BRIAN BLANCHARD	205 977-3064	
ACAC	ED HOUPPERT	404 529-7206	
Comptrollers	SUSAN FURLOW	205 985-8018	
RSOS	RON LOVE	404 529-5822	
RSOS	DONNA WARD	404 529-6112	