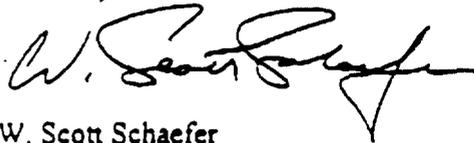


The overall completion date for the EDI effort is dependent upon the completion of Phase One. Therefore, BellSouth is unable to commit to a final implementation date at this time. However, a preliminary view indicates the overall time line will be no more than three months from the time the Phase One work begins.

It is BellSouth's understanding from discussions with AT&T last week that AT&T's request for an electronic ordering interface will be satisfied by BellSouth's implementation of an EDI arrangement for local service requests. BellSouth, therefore, expects that AT&T will withdraw this issue from its petition before the Georgia Public Service Commission. In addition, BellSouth would expect AT&T's support in the Operations and Billing Forum (OBF) of the specific EDI development being pursued by BellSouth as a result of AT&T's request. BellSouth also understands that ~~AT&T has~~ indicated a willingness to pay for the electronic interfaces being requested. Rather than developing separate charges, BellSouth's intention is to net the appropriate costs against the avoided costs associated with resale.

Finally, BellSouth must take issue with AT&T's continued assertion that no response or progress on electronic interfaces for pre-service ordering and service trouble reporting. BellSouth has, in fact, developed pre-ordering interfaces to access information from two systems for a May 1, 1996, availability date, which was the original commitment to AT&T. In addition, the existing IXC gateway for electronic trouble reporting continues to be available for AT&T's use ~~as a reseller~~.

Sincerely,



W. Scott Schaefer  
Acting Vice President  
InterConnection Services

cc: Suzie Lavett

# **ATTACHMENT 1d**



William J. (Jim) Carroll  
Vice President

May 7, 1996

Room 4170  
1200 Peachtree St. NE  
Atlanta, GA 30309  
404 810-7262

Via hand Delivery and Facsimile

W. Scott Schaefer  
Acting Vice President  
InterConnection Services  
BellSouth Telecommunications, Inc.

Dear Scott:

In your letter dated 4/30, you announced BellSouth's intention to move forward with an EDI implementation. Accordingly, we have aligned systems development resources from our companies and have scheduled two conference calls this week and a two-day meeting for next week. While I am encouraged by these steps forward, I find it necessary to again point out that your letter provides only a partial response to AT&T's request.

As you are aware, AT&T has requested real-time electronic interfaces and access to information and systems required to support all aspects of local services resale and unbundled elements, including but not limited to ordering, pre-ordering, provisioning, and maintenance. Real time interfaces are required to provide customers with competitive alternative service at parity with that of the incumbent LEC -- BellSouth, and is totally consistent with the letter and spirit of the Telecommunications Act of 1996. To date, we have not seen enough of the details regarding BellSouth's EDI plan to determine if it is satisfactory as more than an interim solution. Additionally, over the past months, AT&T has repeatedly stated its need to have these interfaces available by 7/1/96 in order to meet our market entry targets. Your letter proposes EDI availability in a timeframe which fails to meet AT&T's required availability date.

Accordingly, based on our current understanding of BellSouth's planned EDI implementation, your proposal falls short of meeting AT&T's requirements and further postpones the introduction of meaningful competition in the marketplace. As a result, we cannot unconditionally withdraw this issue from our petition before the Georgia Public Service Commission.

We would, however, be willing to withdraw this issue from our petition at the Georgia PSC upon full satisfaction of all the following conditions:

1. BellSouth agrees to provide real-time electronic interfaces in all nine states within the BellSouth territory.
2. These interfaces are made operational in Georgia by 7/1 and by 10/1, BellSouth and AT&T will agree to operational dates for the other eight states based on our experiences in Georgia relative to electronic interfaces.
3. BellSouth agrees to a 15% operational inefficiencies discount (as compared to AT&T's proposed 10% operational inefficiencies discount now pending at the Georgia PSC) until these interfaces are delivered, resulting in service parity.
4. All other terms and conditions relative to real-time electronic interfaces are fully negotiated, agreed to, and documented in writing by BellSouth and AT&T no later than 5/19, including AT&T's right to petition or otherwise complain to any state commission or court of competent

jurisdiction regarding BellSouth's failure to meet any of the above conditions.

In addition to the foregoing, I also would like to clarify AT&T's position on several issues.

AT&T proposed EDI as an interim solution. AT&T recognizes that several approaches may result in the desired end of real-time access to information and systems. Although AT&T proposed EDI as one possible interim solution, other methods (including NDM) were also suggested. AT&T encouraged BellSouth to research any solution which would meet AT&T's needs and provided BellSouth with names of other companies who might share their experience in this regard.

Regarding the scope of the electronic interface development, AT&T agrees to the simultaneous development for resale and facilities-based only to the extent this would not jeopardize our operational dates for total services resale.

Regarding the timeline for delivery of BellSouth's EDI implementation, we have talked repeatedly about the need for a 7/1 completion date of full real time electronic interfaces; however, based on the process you describe, I believe availability of these interfaces will not occur until 90 days from 5/6. This timeline will make it unlikely that interim electronic interfaces will be available prior to August. AT&T continues to require 7/1 availability and has the resources required to meet this date. What we lack at present is your commitment to meet this date.

Regarding your expectation that AT&T support BellSouth's proposed EDI solution in the Operations and Billing Forum (OBF), at this time it is premature to determine if the proposed EDI solution will meet AT&T's long term needs. However, as we more fully understand BellSouth's proposal, AT&T remains willing to advocate standards which are in the interests of both AT&T and BellSouth at this and other industry forums, both for interim as well as long term standards.

Finally, in connection with any costs associated with the development of electronic interfaces, it has been AT&T's experience and expectation that BellSouth would achieve such significant operational efficiencies as a result of this development (as compared to manual operations), and that development costs would be nominal. Accordingly, any such costs should be funded by BellSouth. If it is determined that development costs are significant, these costs should be borne by the industry because all will benefit from the development of these interfaces and the resultant competition. It would not be acceptable for BellSouth to "net" these development costs against avoided cost discount.

I hope the foregoing is helpful regarding the issues surrounding electronic interfaces. I look forward to discussing these issues in more detail when we meet this afternoon.

Sincerely,



William J. Carroll

cc: C. Coe

# **ATTACHMENT 1e**

May 16, 1996

William J. Carroll  
Room 4170  
1200 Peachtree Street, N.E.  
Atlanta, Georgia 30309

Dear Jim:

The purpose of this letter is to respond to your three letters to Duane Ackerman, of May 6, 1996 and your letter of May 7, 1996 addressed to me.

May 6, 1996 letters to Duane Ackerman regarding Alabama and Kentucky--BellSouth is pleased that AT&T has elected to begin interconnection, unbundling and resale negotiations for the states of Alabama and Kentucky. BellSouth will now consider these states as a part of the ongoing negotiations between our two companies and will recognize May 6, 1996 as the official date for both states. If this is not the case, please let me know.

Secondly, BellSouth suggests that the two companies go ahead and include the rest of the BellSouth states in the negotiations. If this proposal is acceptable to you, BellSouth will consider the official commencement date for negotiations to be the date of your written acceptance of this proposal.

May 6, 1996 letter to Duane Ackerman regarding operational interfaces and May 7, 1996 to me regarding same--BellSouth maintains that the PC to PC fax interface initially proposed meets the letter and spirit of the Telecommunications Act of 1996 as to interface requirements between the incumbent local exchange carrier and other local exchange carriers. Further, the fax interface is immediately available thus facilitating AT&T's immediate entry into the local exchange reseller market.

Nonetheless, BellSouth has been willing to go further than the requirements of the law through its consideration and offer to provide an electronic interface system for service order transfer and confirmation. It is our expectation that representatives from BellSouth and AT&T will soon be able to agree on the specific requirements for this system.

In addition to the above-mentioned EDI development, BellSouth has continued to explore options for addressing AT&T requests and has taken the following steps:

- (1) BellSouth has developed an initial view of pre-ordering electronic interfaces including electronic access to: RSAG - End office (CLLI) NPA-NXX information, PSIMS - Feature and function availability, ATLAS - Telephone number assignment, DSAP - Due date scheduling.
- (2) BellSouth has developed an initial view of the work necessary to complete service orders to AT&T via an EDI interface.
- (3) BellSouth will consider authorizing the design phase to begin on both the above-mentioned items pending acceptance by AT&T of the terms outlined in the following paragraphs.

BellSouth has two mechanisms for recovering the costs of this additional and discretionary work. The costs of the development of the systems can be netted against the discount offered to resellers for the purchase of BellSouth's retail telecommunications services or the cost can be recovered through non-recurring charges.

At present, AT&T is the only reseller to request that the interface between BellSouth and itself be through electronic systems. Further, in your May 1, 1996 letter, you specifically rejected BellSouth's proposal to net the costs of the development of electronic interface from the discount offered to resellers by BellSouth. BellSouth was surprised by AT&T's reaction to the "netting" concept due to earlier informal indications from AT&T that this method would be worthy of serious consideration and because this approach would spread the costs across resellers utilizing the BellSouth network. As discussed in our meeting of May 14, BellSouth is requesting AT&T put forth a proposal for BellSouth's recovery of these costs that would be acceptable to both parties.

I look forward to our regularly scheduled meetings regarding the negotiations.

Sincerely,



W. Scott Schaefer  
Vice President - Marketing  
InterConnection Services

bcc: Duane Ackerman      Hank Anthony  
Charles Coe              Suzie Lavett  
Jere Drummond          Mary Jo Peed  
Allan Price

# **ATTACHMENT 1f**

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May 30, 1996

Mr. William J. Carroll  
Room 4170  
1200 Peachtree St., NE  
Atlanta, Ga. 30309

Dear Jim:

As discussed in our May 21, 1996, Executive Team meeting, BellSouth believes that "total services resale" encompasses the resale of services as they are offered to BellSouth end users. AT&T contends that some alterations to existing services are appropriate in a resale environment. In spite of our disagreement in this area, BellSouth agreed to revisit technical concerns associated with the development of local services that allow the routing of Operator, Directory Assistance and Repair calls to AT&T in a Total Service Resale environment. In addition, BellSouth felt it prudent to reexamine its policy regarding AT&T's request at this time. BellSouth has concluded that our policy is sound.

BellSouth has further concluded that even absent the policy difference, it is not technically able to provide the services to AT&T in the manner requested. Therefore, BellSouth will no longer pursue technical alternatives regarding the routing of directory assistance, operator and repair service calls in a "total services resale" environment beyond following through to closure our current discussions.

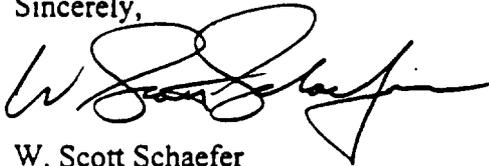
Section 251(c)(4) of the Telecommunications Act of 1996 required a LEC to offer for resale "any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers". Operator Services, Directory Assistance, and Repair Service are not offered to end users. Rather, they are part of some other service, such as a residential line or business line. Therefore, the matters under discussion are not available in a "resale" environment.

Neither are they matters that are required to be unbundled. 251(c)(3) required unbundling only of "network elements". The definition of "network element" clearly does not encompass such matters as those under discussion. In any event, even if BST wished to make those matters available for unbundling, as BST has previously explained to AT&T, it would not be technically possible to do so.

BellSouth has made available to local exchange companies its directory assistance services to allow other companies' customers to obtain telephone numbers and its operator call completion services for use by other companies' customers for completing operator assisted calls. While these services do not constitute network elements under 251(c)(3) of the Act, BellSouth is happy to discuss AT&T's use of these services as a facilities based local exchange carrier.

BellSouth proposes that we agree to disagree on this AT&T requirement and move forward to finalize our Total Services Resale agreement. I look forward to the successful conclusion of our negotiations.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Scott Schaefer". The signature is fluid and cursive, with a large loop at the end.

W. Scott Schaefer  
Vice President - Marketing  
InterConnection Services

# **ATTACHMENT 1g**

WHITE PAPER

APPLICATION ACCESS TO WEB SERVER

9/6/96

This paper describes a possible methodology for using an application client in place of browser to communicate with and obtain information from a Web server. This is provided as additional information in connection with technical specifications and process documents submitted to AT&T in August, 1996. The intent is to show the feasibility of this approach. This approach is beyond the scope of the initial interface required by the Georgia PSC.

The basic architecture for Web technology involves a Common Gateway Interface (CGI) request sent to the server with a stream of data returning as the result set.

The best way to understand HTTP protocol is to use an example. Our example will be Bob's T-Shirts.

The browser or application (client) opens a socket connection to whatever port the web server is using on the host machine. The client then sends a Uniform Resource Locator (URL), to the server. A URL contains several elements and may look something like this:

```
GET http://cotton.bobs-t-shirts.com/pricequery.pl:80?itemnum=WXYGfV11&qty=14&loc=GA HTTP/1.0
```

The following is an explanation of the above string: The GET reference is sent to the domain, cotton.bobs-t-shirts.com on the specified port, 80, using http as the protocol. The CGI script on Bob's server that provides the response to the user is pricequery.pl. The .pl extension indicates that pricequery.pl is a PERL script. The query string, consists of tagged strings separated by ampersands (&). The format of the query strings must be understood by the receiving CGI program. The client waits for the server to return the data.

The web server executes pricequery.pl using the parameters the client specified in the query string. In this case, it specified that the item number (itemnum) is WXYGFV11, the quantity (qty) is 14, and shipping (loc) is to Georgia. The specifics of the parameters must be negotiated prior to system development.

There is another method, POST, that allows more information than will fit into a GET method query string. Basically, with POST, the client sends the URL but instead of a query string you send a stream of tagged lines of data. Normally, a Web browser submitting a form with the POST method used would send these data strings automatically, based on the form information. A client application, however, is forced to emulate the performance of such a browser. It must send the data, specifying content length and then the data stream itself, as a group of <tag>=<value> pairs.

The CGI script (pricequery.pl) returns the response to the server for forwarding to the client. The information being returned to the client can be formatted in several ways. If the client is a browser, the response would be formatted as an HTML page that would be displayed in the browser in a formatted fashion. As an alternative, the response from the server can be [text] output that looks like this:

```
HTTP/1.0 200 Document follows
Date: Wed, 04 Sep 1996 16:21:14 GMT
Server: NCSA/1.4.2
Content-type: text/plain
Last Modified: Wed, 04 Sep 1996 16:21:06 GMT
```

```
itemnum=WXYZGFV11
qty=14
loc=GA
available=11
cost=11.44
shipcost=12.22
```

Once the response is sent, the server terminates the connection. If for some reason the client terminates the connection before the server responds or during the response, the server assumes the client no longer desires the information and disposes of it.

The only issues to resolve are what data is to be sent and returned. The information can be formatted in a variety of ways, including a visual format (HTML) that could be easily viewed from a browser. This provides several debugging methods for client coding, including simply viewing the query results.

As could be seen with the results above, it's a very simple matter to extract the data returned from the server and process it in any way desired. For browser-based solutions, a web form would be utilized and the CGI program would produce HTML-formatted output (With the Content-type: text/html instead of text/plain). This output would draw a formatted screen for the user. In the app-to-app environment, the client would specify that it was an application, and the CGI program would respond with a tagged data string format such as the one above. At that time, the client is free to operate upon the received data however it chooses. In the above example, the system could parse the response data and execute an automatic order that would send another query to Bob's web site.

To summarize:

- To start a communication with the web server, clients must connect via TCP/IP sockets to the web server port on the server host
- Requests from the client may come in the form of a GET method or via the POST method which requires specification of lengths. Both methods require specification of several client configuration parameters such as client type and the data types desired by the client.
- After the request, the socket connection remains open while the client awaits a response. If the connection is closed for any reason, including the client session timing out, the session is considered terminated by both sides and must be reinitiated by the client.
- The client will receive a stream of data that is the server response to the query. For browser-based clients, this will be HTML hypertext to be displayed on the browser. For app-to-app clients, this will be tagged-pair data to be parsed by the client application.
- The connection will be broken by the server at the end of response.

# **ATTACHMENT 2**

1 PLACE: Dobbs Building, Raleigh, North Carolina

2 DATE: Thursday, September 25, 1997

3 TIME IN SESSION: 2:00 P.M. TO 4:57 P.M.

4 BEFORE: Commissioner Jo Anne Sanford, Presiding  
5 Commissioner J. Richard Conder  
6 Commissioner Allyson K. Duncan  
7 Commissioner Judy Hunt  
8 Commissioner Ralph A. Hunt  
9 Commissioner Robert V. Owens, Jr.  
10 Commissioner William R. Pittman

11 IN THE MATTER OF:

12 DOCKET NO.: P-55, SUB 1022  
13 BellSouth Telecommunications, Inc.  
14 BellSouth's In-Region InterLATA Service Pursuant  
15 to Section 271 of the Telecommunications Act of 1996

16

17

Volume 7

18

19 A P P E A R A N C E S:

20

FOR BELLSOUTH TELECOMMUNICATIONS, INC.:

21

22 A.S. Povall, Jr., General Counsel-North Carolina  
23 William J. Ellenberg, II - General Attorney  
24 Edward Rankin, General Attorney and  
Phil Carver, General Attorney  
BellSouth Telecommunications, Inc.  
1521 BellSouth Plaza  
Post Office Box 30188  
Charlotte, North Carolina 28230

25

FOR BELLSOUTH LONG DISTANCE, INC.:

26

27 Jim Cain and Gray Styers  
28 Kilpatrick Stockton  
29 Attorneys at Law  
30 Post Office Box 300004  
31 Raleigh, North Carolina 27622

32

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EXHIBITS ADMITTED

GC MCI Cross Exhibit 1	--
GC MCI Cross Exhibit 2	--
GC AT&T Cross Exhibit 1	--

1 like RNS and DOE, have -- have worked with the LENS  
2 developers to develop the programming code.

3 Q. All right. And I'm more interested in perhaps the  
4 functions that BellSouth sought to include in LENS. Has  
5 there been any comparison of the functions they sought  
6 to include in LENS with corresponding functions in RNS  
7 or DOE that you're aware of?

8 A. Well, there is -- throughout the development  
9 process of LENS, there is -- there has been a need to  
10 identify which functions that it needed to perform, and  
11 that's been done by working with the people who've had  
12 responsibility for the corresponding functions in RNS  
13 and DOE, so --

14 Q. And that's working in the development of the  
15 system itself.

16 I'm actually --

17 A. (Interposing) Correct.

18 Q. I'm sorry.

19 I'm actually more interested in the basis for  
20 your testimony here today that BellSouth believes its  
21 access is nondiscriminatory. And what I'm interested in  
22 is whether there is any analysis recorded in which  
23 BellSouth compares the functions available in LENS with  
24 the functions available in RNS and DOE for preordering.

1 MR. ELLENBERG: Counsel must mean other than  
2 the prefiled testimony which does that point by point,  
3 I'm assuming, in the question?

4 MR. STOUGHTON: I am. Thank you, counsel.

5 A. And that was sort of my next answer, I have done  
6 that in the course of preparing my testimony, and as  
7 reflected by my testimony I have worked with each of  
8 the systems and worked with the experts from all the  
9 systems to understand the functions and the comparison  
10 of them, and that's what is reflected in my testimony.

11 Q. (MR. STOUGHTON) Okay. But other than what's in  
12 your testimony you're not aware of any recorded analysis  
13 comparing the LENS and -- and BellSouth functionality  
14 for its preordering systems?

15 A. No, that was the purpose of my testimony.

16 Q. Okay. Have you done any analysis of the compa- --  
17 -- of a comparison of the timeliness with which  
18 BellSouth provides functions to itself and BellSouth  
19 provides functions to the CLPs through its OSS?

20 A. I've looked at it from the perspective of -- you  
21 know -- well, I say in my testimony it's substantially  
22 the same time and manner that timing is -- if I'm a  
23 BellSouth representative using a retail system can I get  
24 that information while I'm talking to the customer, and

1 using the CLP systems, making that judgment as well, I'm  
2 able to get that information on line on a Realtime basis  
3 while I'm talking to the customer. In terms of system  
4 level response times -- you know -- I mean, I -- from  
5 that perspective in substantially the same time and  
6 manner, I haven't been too interested in whether it was  
7 two tenths of a second, then one, or whatever. But I  
8 think Mr. Moore has been so --.

9 Q. And Mr. -- I'm sorry.

10 A. So -- you know -- if you're talking about the kind  
11 of measurements of -- in seconds, then that's a better  
12 question for Mr. Moore.

13 Q. Okay. We'll ask Mr. Moore.

14 Have you done any comparison between  
15 BellSouth's OSS and the CLP OSSs of the -- the accuracy  
16 with which the OSSs handle particular activities?

17 A. That was -- well, let me see -- let me make sure  
18 -- I can interpret that question a number of ways, so  
19 let me make sure I understand your meaning. If you  
20 could -- I'm not sure I understand your question.

21 Q. Well, why -- why don't you tell me the way you're  
22 interpreting it, and then go ahead and give your answer.

23 A. Okay. For example, we talked a little earlier  
24 about the fact that a letter had been sent to advise the

1 CLPs that we had seen some unexpected results in due  
2 date calculation.

3           And so, yes, there has been some analysis  
4 to see or -- you know -- what prompted that letter was  
5 the fact that there had been some analysis of, let's  
6 look at what kind of due dates we're getting from LENS  
7 versus other systems. And that again has been a joint  
8 effort between the LENS and the DOE and the RNS  
9 programmers.

10 Q.       And as LENS has been operating over the several  
11 months, have you looked at error rates for transactions  
12 entered through LENS, and compared that with error rates  
13 for similar transactions through RNS or DOE?

14 A.       I'm not -- I'm not getting a good clear picture of  
15 what you mean by error rates for transactions.

16 Q.       Have you looked at -- in more broad terms, have  
17 you looked at the quality with which BellSouth's OSS  
18 systems operate compared to the quality with which the  
19 LENS and EDI interfaces operate?

20 A.       I'm not aware that anybody has looked and said,  
21 let's compare the quality of this versus the quality of  
22 that. I mean, that's kind of a -- a broad and nebulous  
23 term.

24           As I mentioned a minute earlier, Mr. Moore has

1 been looking at system level response times. There has  
2 been joint efforts of the programmers to be sure that  
3 the code in the various system -- the programming codes  
4 in it various systems was producing the same results.

5           You know -- I think that a lot of that kind of  
6 analysis is just intuitively obvious when you use the  
7 system if you expect to get telephone numbers back when  
8 you ask for telephone numbers then you get them. I'm  
9 not sure how you analyze the quality of that. If you  
10 get them in both cases, the system is doing what it's  
11 designed to do.

12           There are -- I guess you could say that the  
13 user acceptance testing that was done as part of the  
14 systems development is an analysis of the quality.

15 Q.       And is that documented -- the analysis you've just  
16 described?

17 A.       I don't know.

18 Q.       Okay. Are you aware that -- whether any of the  
19 analyses you've just described are documented?

20 A.       I believe Mr. Moore has some documentation.

21 Q.       As -- as to the timeliness measures?

22 A.       Yes.

23 Q.       You're not aware of that, whether any of the  
24 quality related analyses we've just discussed are

1 documented, I take it, is that right?

2 A. I want to make sure as I answer that that I'm not  
3 representing what I just described as being  
4 quality-related analyses done for the purpose of looking  
5 at the quality of the system.

6 There are a number of things that were done  
7 throughout the process of developing this system that  
8 could fall in that category, you seem to be looking at  
9 that as a particular term of art so I -- I just want to  
10 make sure that I'm clear about that.

11 Q. Well, let me tell you what I'm looking for, so --  
12 so we're clear on this.

13 This Commission has an obligation to evaluate  
14 whether your OSS, BellSouth's OSS are being provided in  
15 a nondiscriminatory fashion. If -- if this Commission  
16 chooses to follow the FCC's guidance then they would  
17 look at such things at the functionality, the timeliness  
18 and the quality with which BellSouth is providing OSS  
19 services to CLPs as compared to how BellSouth provides  
20 similar services to itself.

21 And what I'm asking ultimately is whether  
22 BellSouth has done any analysis of those questions.

23 And what I've heard so far is that other than  
24 what's in your testimony, there is no formal analysis,