maintain and repair collocated equipment within the same time periods as those that apply to the performance of similar functions for the same types of equipment used by BellSouth for itself.

- The facilities installed under this option can be used for interoffice trunking between the CLEC and BellSouth and for access to unbundled network elements.

- Switching equipment cannot be installed under this option.

- SONET-based interconnection is similar to virtual collocation, except that both the CLEC and BellSouth install SONET-based equipment in their respective locations and can choose the SONET equipment supplier of their choice. All of the same options for service configurations exist for this arrangement as with the virtual collocation interconnection.

- With either physical collocation or virtual collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the transmission cables carrying the CLEC's circuits enter BellSouth's premises. At each of its premises where space is available, BellSouth will make available at least two such interconnection points for CLECs.

- BellSouth permits the placement of interconnection facilities that allow a collocating CLEC to connect its equipment in its physical collocation space to the equipment in another CLEC's physical collocation space within the same central office. The CLECs may provide such interconnection facilities themselves or, at the CLECs' request, such facilities will be provided by BellSouth. In the event that the equipment of either or both CLECs is placed in virtual collocation space, BellSouth will provide such interconnection facilities for their use.

- A CLEC may use its collocated facilities to provide interoffice trunking for the purpose of originating and terminating calls between a CLEC's switch and a BellSouth switch, and for transit calls to or from a third party via BellSouth's tandem switch.

- Other interconnection arrangements may be negotiated using the BFR process.

  - For example, some companies prefer a mid-span meet for interconnection in addition to or in lieu of tandem and/or end office interconnection.

- Other examples of negotiated interconnection arrangements include Super Groups and Multiple Tandem Access ("MTA").

- BellSouth has recognized that a CLEC might wish to interconnect with another carrier besides BellSouth through a BellSouth tandem. Although this functionality is not required by the checklist, BellSouth offers intermediary service which provides for such functionality at the access tandem.

- BellSouth has accumulated trunk blockage data revealing that CLECs receive interconnection on par with, or better than, what BellSouth provides itself.

  - Using the latest data from December 1997, and assuming that all of the trunk groups had the same busy hour in the same time period, the trunk blocking rate for CLECs is 1.4 percent (0.9 percent between the tandem and the CLEC switch, plus 0.5 percent between the tandem and a BellSouth end office). Compared to 4.0 percent for BellSouth (2.0 percent for each group to the tandem), this data reveals that the service quality provided to CLECs is consistent with or higher in quality that the service levels BellSouth provides its own retail customers.

  - BellSouth identifies where the blockage is occurring by collecting data, on a weekly basis, from both BellSouth's and CLECs' trunk groups. The data are processed weekly to calculate the percent blocking during the time-consistent busy hour ("TCBH"). The TCBH is defined as the identical hour each day during which, over a number of days, the highest traffic is measured. BellSouth breaks down the data indicating percent blocking, size of trunk groups, and busy hour.

  - BellSouth works with CLECs on trunk forecasts and planning, participating in numerous meetings with CLECs to gather trunking information and thereby minimize blockages.

    - BellSouth has found that where problems do arise, it is largely due to CLECs providing "just-in-time" reports on trunks, rather than forecasts. BellSouth does not maintain spare terminations and facilities that would be ready immediately to accommodate such requests.

    - Some CLECs do not provide <u>any</u> notice. They simply request trunks after already having committed to end users. In these instances, blocking is highly probable due to unexpected CLEC volume.

    - Blocking also arises because CLECs are not ready to add trunks as ordered by BellSouth or require a long lead time of several weeks before being able to turn up the trunks.

- BellSouth reroutes calls that otherwise would be blocked.

  - BellSouth's trunking network relies heavily on alternate routing first to "high usage" trunk groups (often directly between the originating and terminating switches) and "final" trunk groups (between the original switch and the tandem switch and between the tandem switch and the terminating switch.) Trunk forecasts, developed using actual measured volumes, contribute significantly to the effective use of this trunking network architecture.

  - Where sufficient information regarding traffic volumes and patterns is available, a call may be rerouted from the high usage trunk group to the final group without the caller ever knowing.

  - Because of the use of this trunking architecture, a high volume of calls that would have been blocked will have been rerouted from the high usage trunk group to the final trunk group.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 3: POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY

- BellSouth provides access to poles, ducts, conduits and rights of way under standard license agreements pursuant to section 224.

- BellSouth provides access to engineering records that guide CLECs seeking access to BellSouth's poles, ducts, conduits, and rights-of-way.

- BellSouth processes requests for access on a first-come, first-served basis. A CLEC has one year from the issuance of a license to occupy space. BellSouth does not reserve space for its own future business needs.

- No rental fee is charged to the CLEC until the license is issued. Charges commence on the first day of the calender month following the issuance of the license. There is a one-month minimum charge.

- The CLEC pays for all "make-ready" work undertaken by BellSouth to prepare BellSouth's conduit systems, poles, or anchors and related facilities for the requested occupancy or attachment of the CLEC's facilities.

    - Make-ready work includes clearing obstructions, rearrangement and transfer, replacement, or removal of existing facilities, and repair, enlargement, or modification of BellSouth's facilities. BellSouth does not charge for any such changes that are effected to meet BellSouth's, rather than the CLEC's, needs.

    - To the extent that parties other than BellSouth are required to perform "make-ready" work, because they have facilities in the conduit in question, the relevant parties will have to work together to ensure timely completion of all necessary work.

- BellSouth's rates are based on the FCC's formula unless a CLEC negotiates different rates or the state commission establishes different rates.

- The time needed to negotiate and implement access to BellSouth's poles, ducts, conduits, and rights-of-way varies, depending upon the CLEC's specific needs and the work that is required to satisfy those needs:

    - Once a CLEC signs an agreement, the CLEC is responsible for requesting the records to determine whether facilities are available for lease.

    - BellSouth mails its operational guidelines to CLECs with copies of the agreement for signature. BellSouth will make records available for CLECs within five business days of a request at the appropriate record

maintenance center or, at the CLEC's option, will mail the information directly to the CLEC within twenty business days.

- The CLEC then submits a license application, together with a proposed construction schedule.

- The CLEC may contract with BellSouth for a BellSouth-certified contractor to perform the make-ready work.

- If the CLEC contracts with BellSouth to perform the make-ready work, BellSouth will follow its normal construction timeframe.

- CLECs are responsible for maintenance of and any work required with respect to facilities attached to or placed in BellSouth's conduit, duct space, or pole attachments. BellSouth has no maintenance obligations for CLECs' facilities.

- While BellSouth requires 48 hours notice from CLECs for access to manholes under normal conditions for investigating facilities, a shorter time frame may be worked out in an emergency.

- Numerous LECs have negotiated license agreements with BellSouth that allow them to attach their facilities to BellSouth's poles and place their facilities in BellSouth's ducts and conduits.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 4: UNBUNDLED LOCAL LOOPS

- BellSouth provides nondiscriminatory access to the following loop types under the Statement:. Service Level 1 ("SL1") and Service Level 2 ("SL2") 2-wire voice grade analog lines, 4-wire voice grade analog lines, 2-wire ISDN digital grade lines, 2-wire Asymmetrical Digital Subscriber Lines ("ADSL"), 2-wire and 4-wire High-bit-rate Digital Subscriber Lines ("HDSL"), 4-wire DS1 digital grade lines and 4-wire 56 or 64 Kbps digital grade lines. As described in BellSouth's Statement of Generally Available Terms and Conditions, SL1 is a non-designed circuit with engineering information documentation available at an additional charge, while SL2 provides a designed circuit with a design layout record and test access.

- BellSouth provides access to loops: at any technically feasible point; with access to all features functions, and capabilities; unbundled from other UNEs; of equal quality to what BellSouth provides itself; without any restrictions that impair use by CLECs; for a CLEC's exclusive use; and in a manner that enables CLECs to combine loops with other UNEs.

- In addition to the unbundled loop, CLECs may request loop distribution, loop cross connects, loop concentration in the central office, and access to the Network Interface Device ("NID") as described below:

  - Loop distribution (or "distribution media") provides a transmission path for 2-wire voice-grade analog loops between a feeder distribution interface and the NID at the customer's premises. If the CLEC were to take loop distribution as an unbundled element, then the CLEC would presumably provide its own feeder facilities to its own switch.

  - Loop cross connects allow the end-to-end local loop to be extended from the main distribution frame in BellSouth's central office to a CLEC's collocated space. BellSouth provides 2-wire and 4-wire voice grade cross connects as well as DS1 and DS3 cross connects.

  - Loop concentration enables CLECs to concentrate up to 96 sub-loops on 2 DS1s for the purpose of connecting the sub-loops (at a concentrated level) to BellSouth's feeder system.

  - The NID provides a single line termination device or that portion of a multiple line termination device required to terminate a single line or circuit. The NID, located on the customer's premises, establishes the official network demarcation point between a telecommunications company and its end user customer. The NID used in residential applications also provides a protective ground connection as required in Article 800 of the National Electric Code 1996. BellSouth provides

access to the NID on an unbundled basis, regardless of whether a state commission treats the NID as a separate UNE or a subloop element. CLECs also may order a loop-NID combination. If a CLEC orders an unbundled loop, BellSouth will provide the NID also, upon request of the CLEC.

- In some states, AT&T has made an issue of its desire for unbundling of loops "behind" integrated digital loop carrier ("IDLC") equipment.

  - IDLC is a complete loop integrated with the switch. This includes loop facilities, multiple NIDs, distribution media, remote terminal and feeder. The feeder interfaces directly to the digital switch at the DS1 level without the requirement for a central office terminal or other demultiplexing equipment.

  - AT&T desires the ability to utilize single unbundled loops that are integrated into IDLC arrangements.

  - BellSouth cannot provide an unbundled loop through integrated digital loop carrier facilities.

  - Nevertheless, several alternatives have been investigated for those loops served by IDLC, including:

    - Alternative 1: Reassign the loop from an integrated carrier system and use a physical copper pair.

      - If sufficient physical copper pairs are available, BellSouth will assign the unbundled loop to a physical copper pair.

      - Available facilities are those that are generally available for use rather than those installed for another specific purpose.

      - Unavailable facilities could include, but are not limited to the following: Unloaded pairs in a loaded area reserved for digital services or limited physical copper pairs placed in a Carrier Serving Area for services that cannot be integrated.

    - Alternative 2: In the case of Next Generation Digital Loop Carrier ("NGDLC") systems, "groom" the integrated loops to form a virtual Remote Terminal ("RT") set-up for universal service.

      - "Groom" means to assign certain loops (in the input stage of the NGDLC) in such a way that discrete combinations of multiplexed loops may be assigned to transmission facilities (in the output stage

of the NGDLC). This is a technically feasible alternative in cases where NGDLC facilities are available.

- Both of the NGDLC systems currently approved for use in the BellSouth network have "grooming" capabilities; however, the availability of this option is limited.

- Given that NGDLC is still a relatively new technical capability, there is currently an insufficient amount of NGDLC in the BellSouth network to meet AT&T's expected demand. Indeed, only a small percentage of lines are served via NGDLC.

- Since some special service circuits cannot be supported through an integrated system, some NGDLC capacity is normally reserved to support those special service circuits through a universal arrangement based on site-specific forecasts. This option is available only where fully approved NGDLC systems are operating.

- As in the case of Alternative 1 described above, available facilities are those that are generally spare and available for use rather than those placed to meet other specific needs.

- BellSouth's procedures for reusing customer loops when an end user transfers service from a local service provider ("LEC-A") to a new local service provider ("LEC-B") are described below. These procedures apply irrespective of the local exchange carriers involved.

  - BellSouth will process and issue due dates for disconnect and reconnect or change orders to transfer the service using current interval guidelines.

  - The serving facility for the retail or resale service, unbundled loop and/or unbundled port will be reused for the same end user at the existing location.

  - LEC-A (if not BellSouth) will be notified subsequent to the disconnect function being completed.

- BellSouth informs CLECs through various channels whenever repair work may require loops to be taken out of service or whenever there is a network outage. Notification is provided to CLECs upon trouble receipt by BellSouth's repair centers whenever the centers are aware of outage conditions or by the BellSouth Network Management Center if such an understanding has been reached between BellSouth and the CLEC. Any CLEC

can negotiate the process for network outage notification. AT&T, for example, has taken BellSouth up on its offer and negotiated an agreement with the BellSouth Network Management Center. See AT&T Agreement Attachment 5, ¶ 3.1.7.

- As of December 31, 1997, BellSouth had provisioned 9,276unbundled loops to CLECs in its nine-state region.

- BellSouth has tested the availability of: (1) 2-wire and 4-wire unbundled voice loops; (2) 56 Kbps and Basic Rate Interface unbundled digital loops; (3) unbundled DS1 with bundled interoffice transport; (4) ADSL capable loop and; (5) HDSL 2-wire and 4-wire capable loops. An order for each of these items was generated and flowed through BellSouth's systems in a timely and accurate fashion. Billing records were reviewed as part of the end-to-end testing to verify that each item had been billed correctly.

- BellSouth conducted a study of its cutover results. Of a sample 325 loops provisioned to a CLEC in Georgia, 318 loops (98%) were cutover within 15 minutes. BellSouth has taken steps to address the problems that contributed to delays for the other 2 percent and, in that process, has addressed each of the specific allegations regarding loop cutovers raised by commenters in section 271 proceedings to date.

- Where repair is required to correct a deficiency and BellSouth is at fault, BellSouth covers all charges for the repair of unbundled loops.

- BellSouth's times for processing orders are as follows:

  - Order and Provision and Unbundled Switch Port and Loop

Order processing:	43 minutes for residential; 59 minutes for small business; 79 minutes for large business (plus 10 minutes for each additional line)
Provisioning:	Ports: 3 days (1-10 ports); 4 days (11-25 ports) Loops: 5 days (1-5 loops); 7 days (6-14 loops)

  - Order and Provision a Resale "Switch as Is"

Order Processing:	43 minutes for residential; 59 minutes for small business; 79 minutes for large business (plus 10 minutes for each additional line)
Provisioning:	Same day if received by 3:00 pm EST; otherwise next business day

  - Order and Provision a PIC Change:

Order Processing:	30 minutes
Provisioning:	Same day if received by 3:00 pm EST; otherwise next business day

- There will be no significant increase to the loop length as a result of provisioning the loop to the collocation space. Typically, the loop and the associated cross-connect to the collocation space would not be any longer than the loop and the associated cabling to a BellSouth switch. BellSouth will make whatever adjustments are necessary to ensure that the unbundled loop types requested meet the appropriate performance characteristics. The CLEC would be responsible for making any adjustments between its collocation space and the CLEC switch. In addition, due to the fact that the loop is not connected to the BellSouth switch, the CLEC will be responsible for providing any switch-based conditioning.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 5: UNBUNDLED LOCAL TRANSPORT

- BellSouth offers unbundled local transport with optional channelization for such local transport from the trunk side of BellSouth's switch. BellSouth offers both dedicated and common transport for use by CLECs. BellSouth has technical service descriptions outlining both dedicated and shared interoffice transport and has procedures in place for the ordering, provisioning, and maintenance of these services.

- Dedicated Transport. Voice grade or DS0 channels would typically be used to transport an unbundled loop to a CLEC's switch. A DS1 could also be used for this purpose, typically in conjunction with central office multiplexing or concentration (discussed under Checklist Item No. 4). DS1 transport can also be used if a CLEC wishes to purchase transport facilities from BellSouth rather than providing its own facilities when interconnecting its switch with BellSouth's network.

  - As of November 30, 1997, BellSouth had provided 1,223 dedicated trunks providing interoffice transport to CLECs in its nine-state region.

- Common (Shared) Transport. BellSouth offers to provide common transport when a CLEC requests unbundled local switching from BellSouth. In such a case, CLEC traffic follows the identical transmission paths as BellSouth's traffic, in accordance with the routing tables in the BellSouth central office switches.

  - BellSouth permits a requesting carrier to use shared transport to provide interstate exchange access to customers for whom the carrier provides local service.

  - CLECs choosing common transport are entitled to collect the associated interstate access charges.

  - When a tandem switch is utilized, a charge for tandem switching applies in addition to the transport rates. This is similar to the application of a tandem switching charge for interconnection at a tandem switch.

  - BellSouth is providing shared transport to two CLECs. Specific counts of trunks providing service to CLECs can not be determined, because all trunks in a given trunk group are available for any carrier which uses that group, including BellSouth and in some cases multiple CLECs.

- Other forms of transport, requiring greater levels of capacity, are available through the BFR process.

- Unbundled interoffice transport (both dedicated and shared) is very similar to the interoffice transport components of special access services that BellSouth has been

providing for years. However, BellSouth did conduct testing which verified that service orders for dedicated transport, shared transport, and unbundled channelization flowed through the back office systems as planned and that accurate bills were generated.

- Mechanized billing has been available since September 25, 1997. Mechanized data to permit billing of interstate access has been available since December 19, 1997. Paper data has been available since November, 1997. BellSouth requires contract provisions (either in a new contract or as part of an amendment to an existing interconnection agreement) before CLECs may receive the Access Daily Usage File ("ADUF").

  - BellSouth currently provides OLEC (Other Local Exchange Carrier) Daily Usage File or Optional Daily Usage File ("ODUF") information electronically to CLECs.

  - ADUF charges mirror ODUF charges, with the exception of the Recording Service. The ODUF rate for Recording Service is not applicable to these messages. It only applies to unbundled operator services messages. An example of the charges that apply, as approved by the Louisiana PSC, is: $0.0024 per message for Message Distribution and $0.00003 per message for Data Transmission. If a CLEC chooses to receive this data via magnetic tape — rather than through the Connect Direct Service at no additional charge — there is a charge of $47.30 per tape.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 6: UNBUNDLED LOCAL SWITCHING

- BellSouth provides both end-office switching and tandem switching on an unbundled basis.

- A CLEC can purchase unbundled switching separately from the other unbundled components needed to complete a local call. CLECs choosing unbundled switching are entitled to collect the associated interstate access charges.

- BellSouth offers switch ports and associated usage unbundled from transport, local loop transmission, and other services. Available ports include 2-wire and 4-wire line ports, 2-wire and 4-wire DID ports, 2-wire ISDN digital line side ports, 4-wire ISDN DS1 digital trunk ports, and coin ports. Additional port types may be requested under the BFR process.

- As of December 31, 1997, CLECs had in service 50 unbundled switch ports obtained from BellSouth.

- Switch ports are offered with all vertical features. BellSouth will work with CLECs to develop features for which BellSouth currently does not offer, for example by unbundling two features that currently are offered on a bundled basis.

  - While some of BellSouth's interconnection agreements today treat vertical features as retail offerings, these will be amended as necessary to reflect the Eighth Circuit's decision in Iowa Utilities Board when that decision becomes final.

  - No CLEC has yet used the BFR process to request any vertical features not currently offered by BellSouth.

  - One CLEC claims that BellSouth refused to process its orders for 900 Number Blocking and Call Hold in Kentucky. BellSouth does not offer either of these features on a "stand alone" basis, which is why new arrangements had to be worked out for the CLEC. On November 3, 1997, BellSouth offered the CLEC an alternative way of providing the "stand alone" 900 Number Blocking it desired, and invited the CLEC to issue a Bona Fide Request for a "stand alone" Call Hold feature.

- Selective routing capability, as offered using line class codes, is subject to state commission rulings and the availability of these codes in each central office switch and is offered on a first-come, first-served basis.

  - The current capacity for line class codes (or their equivalents) for each switch type

in BellSouth's network is as follows:

Lucent Technologies 1AESS:	1024 (increasing to 2048)
Lucent Technologies 5ESS:	496
Nortel DMS-100 and DMS 100/200	2024
Nortel DMS-10	512
Siemens Stromberg Carlson DCO	512
Siemens EWSD	4096

- BellSouth has not denied any request for selective routing based on lack of line class code capacity.

- BellSouth has developed an electronic process which enables CLECs to convert as many resale customers to customized routing as they wish per day. The CLECs need only designate which line class codes will be used for a given order.

- A technical trial of selective routing using BellSouth's AIN platform commenced in Georgia during January, 1998 and is progressing as originally scheduled.

- BellSouth has a technical service description and has procedures in place for the ordering, provisioning, and maintenance of switching services.

- Mechanized billing has been available since September 25, 1997. Included in the mechanized billing process is the capability to bill accurately for local switching, tandem switching, and shared transport. No specific billing complaints have been initiated by CLECs.

  - Mechanized data to permit billing of interstate access charges to CLECs' interexchange carrier customers has been available since December 19, 1997.

  - Paper data has been available since November, 1997.

  - BellSouth requires contract provisions (either in a new contract or as part of an amendment to an existing interconnection agreement) before CLECs may receive the Access Daily Usage File ("ADUF").

    - BellSouth currently provides OLEC (Other Local Exchange Carrier) Daily Usage File or Optional Daily Usage File ("ODUF") information electronically to CLECs.

    - ADUF charges mirror ODUF charges, with the exception of the Recording Service. The ODUF rate for Recording Service is not applicable to these messages. It only applies to unbundled operator services messages. An example of the charges that apply, as approved by the Louisiana PSC, is: $0.0024 per message for Message Distribution and $0.00003 per message

for Data Transmission. If a CLEC chooses to receive this data via magnetic tape — rather than through the Connect Direct Service at no additional charge — there is a charge of $47.30 per tape.

- BellSouth has had the capability to send access records to CLECs via the ADUF since November . 1997. The file contains recrods for access calls terminating to unbundled ports.

- The application of intrastate access charges is a state pricing decision.

- BellSouth's times for processing orders are as follows:

  - Order and Provision an Unbundled Switch Port and Loop

Order Processing:	43 minutes for residential: 59 minutes for small business; 79 minutes for large business (plus 10 minutes for each additional line)
Provisioning:	Ports: 3 days (1-10 ports); 4 days (11-25 ports) Loops: 5 days (1-5 loops); 7 days (6-14 loops)

  - Order and Provision a Resale "Switch as Is"

Order Processing:	43 minutes for residential; 59 minutes for small business; 79 minutes for large business (plus 10 minutes for each additional line)
Provisioning:	Same day if received by 3:00 pm EST; otherwise next business day

  - Order and Provision a PIC Change:

Order Processing:	30 minutes
Provisioning:	Same day if received by 3:00 pm EST; otherwise next business day

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 7: NONDISCRIMINATORY ACCESS TO 911, E911, DIRECTORY ASSISTANCE, AND OPERATOR CALL COMPLETION SERVICES

A. 911 & E911

- No change in material facts since Commission found BellSouth to be in compliance. South Carolina Order ¶¶ 225-230.

- There has been no change in BellSouth's policy regarding E-911 databases. BellSouth provides CLECs mechanized access to the E911 databases for purposes of updating those databases. BellSouth's E911 Local Exchange Carrier Guide for Facility Based Providers provides the information needed for CLECs to interconnect to BellSouth for 911 and E911 services.

B. Directory Assistance

- In its approved interconnection agreements and approved or effective Statements BellSouth commits to perform directory assistance ("DA") services and other number services on behalf of facilities-based CLECs.

- BellSouth's DA service is available on a nondiscriminatory basis to CLECs providing local exchange service to end user customers in exchanges served by BellSouth. CLECs have the ability to provide their end users with the same access to BellSouth's DA service as BellSouth's end users by dialing 411 or the appropriate area code and 555-1212.

- BellSouth offers not only to perform DA and directory assistance call completion ("DACC") services on behalf of CLECs, but also to provide CLECs with direct access to its DA databases.

    - BellSouth offers three services to local exchange providers that will provide CLECs access to BellSouth's DA database under the same terms and conditions currently offered to other telecommunications providers: 1) Directory Assistance Access Service ("DAAS"), by which BellSouth currently provides DA to interexchange carriers; 2) Direct Access Directory Assistance Service ("DADAS"), which provides direct on-line access to BellSouth's DA database; and 3) Directory Assistance Database Service ("DADS"), which provides a copy of the BellSouth DA database. Details of BellSouth's services are set out in a technical service description.

    - Database information is available to CLECs in magnetic tape, cartridge tape, and the network data mover ("NDM)" formats.

- BellSouth includes both facilities-based and reseller CLECs' subscriber listings in BellSouth's DA databases free of charge.

  - The service order process is used to add, delete or modify listings for the DA database in the same manner and within the same intervals that BellSouth end user listings are populated in such databases.

  - If a listing is non-published, the database gives the name and an indicator that the number is non-published. If the customer instead requests non-list, the customers's name would not appear in the white pages directory but would be included in the database for any directory assistance operator to provide.

  - BellSouth Advertising & Publishing Corporation (BAPCO) publishes 510 different directory titles at an accuracy rate of 99.99 percent. Of 19,359,685 listings, there were 468 claimed errors, which turned out to represent only 138 true errors. There have been claims of only two white page errors for CLECs. BAPCO is currently in the process of determining the cause of the errors. Wherever BAPCO is responsible, it fixes the error and ensures it will not reoccur; if the CLEC is responsible, BAPCO provides feedback to ensure the CLEC avoids making the error in the future. A quarterly release is provided to CLECs which includes instructional information addressing any common CLEC errors.

  - The CLEC must agree to cooperate with BellSouth in formulating appropriate procedures regarding lead time, timeliness, format and content of listing information.

- Providing DA from a CLEC's own switch requires that the call be delivered to the operator service switch in a terminating Feature Group D format. Standard trunk signaling formats will be used to send the originating call to the operator services switch. The originating call will be delivered to the number services switch over a dedicated trunk facility.

- BellSouth will provide selective routing to requesting CLECs' DA service platforms in order to route calls using the same dialing arrangements that BellSouth customers use to access DA.

  - Selective routing capability using line class codes is subject to state commission rulings and the availability of these codes in each central office switch and is offered on a first-come, first-served basis.

  - The current capacity for line class codes (or their equivalents) for each switch type in BellSouth's network is as follows:

Lucent Technologies 1AESS:	1024 (increasing to 2048)
Lucent Technologies 5ESS:	496
Nortel DMS-100 and DMS 100/200	2024
Nortel DMS-10	512
Siemens Stromberg Carlson DCO	512
Siemens EWSD	4096

- BellSouth has not denied any request for selective routing based on lack of line class code capacity.

- A technical trial of selective routing using BellSouth's AIN platform commenced in Georgia during January, 1998 and is progressing as originally scheduled.

- Such selective routing can only be provided when a CLEC leases unbundled local switching or uses BellSouth's resold local exchange service.

- BellSouth will offer such selective routing to provide branded DA services for CLEC customers.

- BellSouth will not charge for selective routing using the interim solution of line class codes.

- A technical trial of selective routing using BellSouth's AIN platform commenced in Georgia during January, 1998.

C. Operator Services

- BellSouth makes available its operator services to CLECs in the same manner that it provides operator services to its own retail customers. Additionally, BellSouth offers Centralized Message Distribution System - Hosting ("CMDS-Hosting") and Non-Sent Paid Report System ("NSPRS") processing.

  - Busy Line Verification ("BLV") and Busy Line Verification and Emergency Interrupt ("BLVI") allow an end user to request that the operator verify that a line is busy or interrupt a conversation that is in progress.

    - BellSouth has developed methods and procedures to be followed when customers want a BellSouth operator to verify or interrupt a telephone number that has been ported to a CLEC switch.

    - It is not technically possible at present for the BellSouth operator to verify such a line in a CLEC switch except where the CLEC and BellSouth

establish a special trunk group between the BellSouth operator services platform and the CLEC switch. Thus, in the case of verification or busy line interrupt requests from customers served by BellSouth's switches, absent such a special trunk group an operator-to-operator transfer is required such that the BellSouth operator can pass the request off to the CLEC's operator. Work is in progress, however, to establish a special trunk group between BellSouth's operator services platform and the operator services platform of a CLEC in Georgia.

- Operator Call Processing Access Service provides operator and automated call handling, including processing and verification of alternative billing information for collect, calling card, and billing to a third number. Unbundled Operator Call Processing Access Service for facility-based carriers also provides customized call handling, dialing instructions, and other operator assistance that the customer may desire.

- Operator Services Transport is used to transport calls from CLEC customers to BellSouth's operator systems. To the extent a CLEC resells BellSouth's local services or purchases unbundled local switching, the CLEC may also obtain selective routing that would allow an operator call to be routed to a BellSouth operator or to be routed to another operator services provider of the CLEC's choosing. (See above for discussion of selective routing.)

- BellSouth offers Intercept Service for calls to customers of facilities-based CLECs that is identical to the capability that is used today by BellSouth for calls among its end users. Calls to the CLEC's end users are "intercepted" in the event of a number change or disconnect.

- Centralized Message Distribution System ("CMDS") Hosting is the BellCore-administered national system used to exchange Exchange Message Record ("EMR") formatted messages among host companies. All intraLATA and local messages originated and billed in the BellSouth region involving BellSouth CMDS hosted companies will be processed through the Non-Sent Paid Report System ("NSPRS"). NSPRS 1) provides information regarding non-sent paid message and revenue occurring on calls originated and billed within the BellSouth region; 2) distributes BellCore-produced Credit Card and Third Number System ("CATS") reports; and 3) distributes BellCore-produced non-conterminous CATS reports.

- BellSouth has prepared a technical service description as well as ordering, provisioning, and maintenance procedures for its operator call processing service.

- Facilities-based CLECs can obtain access to operator call processing by connecting their

point of interface via a trunk group to BellSouth's operator services system. As of November 30, 1997, BellSouth had provided CLECs with 245 operator services trunks and 61 verification trunks.

- Because methods and procedures have been in place to allow other carriers, such as independent LECs, access to BellSouth's operator call processing, the necessary methods and procedures for obtaining such access by CLECs are business as usual. Accordingly, end-to-end testing was not performed for operator call processing.

- Branding for operator services is provided in accordance with the state commissions' decisions.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 11: NUMBER PORTABILITY

- BellSouth provides interim number portability through both Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID"). BellSouth has technical service descriptions outlining RCF and DID and has procedures in place for ordering, provisioning, and maintaining these services.

  - RCF is an existing switch-based BellSouth service that redirects calls within the telephone network by translating the dialed number to a new number.

  - For DID, BellSouth routes the call over a dedicated facility to the CLEC's switch, instead of translating the dialed number to a new number.

- Other methods of number portability such as Route Index-Portability Hub ("RI-PH"), Direct Number Route Index ("DNRI"), and Local Exchange Routing Guide ("LERG Reassignment") have been negotiated with AT&T and are available to other carriers through the BFR process.

  - The technical feasibility of RI-PH was confirmed in lab testing conducted by BellSouth and a CLEC during November, 1996. RI-PH can be implemented as requested by CLECs, except that this method will not function with Lucent 1AESS switches in an area where ten digit local dialing is required.

  - BellSouth has likewise confirmed the technical feasibility of DNRI. However, unlike RI-PH, no CLEC has yet agreed to test DNRI.

- Attachment G to BellSouth's Statements of Generally Available Terms and Conditions provides that in the event either company (BellSouth or the CLEC) determines in its reasonable judgment that the other company will likely impair or is impairing service to any of its end users, that company may either refuse to provide Service Provider Number Portability ("SPNP") service or may terminate SPNP service to the other party after providing appropriate notice. This requirement is included in the Statements to deal with the unlikely emergency situations when a provider cannot be reached. BellSouth will not unilaterally terminate services without extensive discussion with a carrier.

- As of November 30, 1997, BellSouth had ported 27,487 business and 57 residence directory numbers.

- BellSouth coordinates number portability and loop cutovers. Although the porting of numbers and cut-over of loops is <u>coordinated</u>, BellSouth has advised CLECs that number portability and unbundled loop cutover may not occur <u>simultaneously</u>. BellSouth will advise the CLEC as to when it will put the number portability order into the switch, but the exact timing of when the switch will complete the order is beyond the control of

either BellSouth or the CLEC.

- In the early stages of implementing number portability, BellSouth experienced some technical problems (such as incorrect switch translations) that caused service to certain customers of certain CLECs to be disrupted. BellSouth took appropriate steps to correct those problems. For example:

  - BellSouth has added an "overflow" route from the BellSouth switch to the CLEC switch for calls to ported telephone numbers.

  - BellSouth has modified the process for making related switch translations such that BellSouth's technicians are automatically reminded of proper procedures and prompted to affirm the technician's intent to make changes.

- BellSouth is implementing permanent number portability in accordance with FCC rules.

  - BellSouth is an original member of the Southeast Region Limited Liability Corporation and, along with CLEC and IXC members, is overseeing implementation of the southeast region Number Portability Administration Center ("NPAC") database.

  - In cooperation with the state commissions, the switch selection process has been completed for Georgia and Florida.

  - In addition, members of the Southeast Operations/Implementation Subcommittee have met with the staffs of the Tennessee Regulatory Authority and state Commissions in Louisiana, North Carolina, South Carolina, Alabama, Florida, Georgia, and Kentucky. The Tennessee Regulatory Authority and the Public Service Commission staff in Louisiana, North Carolina, and South Carolina have agreed to perform the function of impartial agent for the switch selection process in their respective states.

  - BellSouth will implement permanent number portability in a phased manner. Once the southeast regional NPAC database is delivered and a 30-day inter-company testing period is completed, BellSouth will implement number portability on a staggered basis throughout the time period allowed for Phase I. This same approach will be used by BellSouth for all Metropolitan Statistical Areas in all states that will be implementing permanent number portability.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

- In each state, under the supervision of the relevant state commission, BellSouth has established just and reasonable prices for reciprocal compensation such that CLECs and BellSouth receive mutual and reciprocal recovery of costs associated with the transport and termination on each carrier's facilities of local calls that originate on the network facilities of the other carrier. Recovery is based on a reasonable approximation of the additional costs of terminating calls.

- No payments are exchanged for traffic between BellSouth and CLECs that purchase UNEs. Instead, reciprocal compensation payments due from BellSouth are offset by payments due to BellSouth for the CLEC's use of UNEs to terminate traffic. Because no payments are made for this traffic, no traffic data is provided.

- Reciprocal compensation applies only to local traffic.

  - When traffic other than local is routed on the same facilities as local traffic, each company will report to the other a Percentage Local Usage ("PLU"), which is used to determine the amount of local minutes to be billed to the other company.

  - PLU is defined as a factor to be applied to intrastate terminating minutes of use. The numerator includes all "nonintermediary" local minutes of use adjusted for those minutes of use that only apply to local due to number portability. The denominator is the total intrastate minutes of use including local, intrastate toll, and access (adjusted for number portability), less intrastate terminating company paid minutes of use.

- Traffic of enhanced service providers ("ESPs") is not local. Accordingly, BellSouth does not pay or bill reciprocal compensation for ESP traffic.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 14: RESALE

- BellSouth offers its tariffed retail telecommunications services to other telecommunications carriers for resale to their end user customers. A CLEC may resell BellSouth's tariffed retail telecommunications services subject to the terms and conditions specifically set forth in BellSouth's state-approved interconnection agreements and Statements of Generally Available Terms and Conditions. These documents outline specific terms and conditions relating to the resale of certain services, including:

  - A reseller of BellSouth's retail services is prohibited from cross-class selling. For example, residential service may not be resold to business customers.

  - BellSouth offers for resale its promotions of 90 days or more at the promotional rate, less the wholesale discount (except in Tennessee where the state commission has ordered that CLECs may choose either the wholesale discount off of the tariffed rate, or the promotional rate). Promotions of less than 90 days are available for resale in accordance with state commission orders.

  - Grandfathered services may be resold only to subscribers who have already been grandfathered. Grandfathered services may not be resold to a different group or a new group of subscribers.

  - BellSouth makes Contract Service Arrangements ("CSAs") available for resale as established by the relevant state commission. The rate charged for CSAs is a local pricing matter wholly within state jurisdiction. See Order on Motions for Enforcement of the Mandate, Iowa Utils. Bd. v. FCC, No. 96-3321, slip. op. (January 22, 1998); Writ of Mandamus, Iowa Utils. Bd. v. FCC, No. 96-3321 (Jan. 22, 1998).

  - LifeLine service is available for resale. This service may be resold only to subscribers who meet the criteria that BellSouth would apply to its end users. CLECs are required to purchase BellSouth's basic local service at the tariffed rate, less the wholesale discount. CLECs must further discount basic local service to LifeLine customers with a discount which is no less than the minimum discount that BellSouth now provides, and it is capped at the flat rate offered by BellSouth. BellSouth will charge the federally-mandated Subscriber Line Charge (currently $3.50) to CLECs, and CLECs are required to waive the Subscriber Line Charge for the end-user. CLECs are responsible for recovering the Subscriber Line Charge from the National Exchange Carriers Association's interstate toll settlement pool.

  - Link Up service also is available for resale. This service may be resold only to subscribers who meet the criteria that BellSouth would apply to its end users.

- CLECs are required to discount the Link-Up service by at least the percentage that is currently provided by BellSouth to its Link Up customers. Each CLEC will be required to recoup the additional discount in the same manner as BellSouth does today.

- The CLEC will be the customer of record for all retail services purchased from BellSouth. In general, BellSouth will take orders from, bill and expect payment from the CLEC. The CLEC will also be BellSouth's point of contact for ordering activities and repair calls. BellSouth will accept PIC changes from the CLEC as the customer of record, but BellSouth will also accept PIC changes directly from the IXC, as it does today.

- Shared tenant service ("STS") is offered through BellSouth's state STS tariffs and is usage-based. STS providers are restricted from using flat-rate local exchange service to provide STS. However, STS providers can become certificated as CLECs, thereby making flat-rate local exchange service available to them at wholesale rates.

- BellSouth has developed technical service descriptions as well as ordering, provisioning, and maintenance procedures for the "top 50" retail telecommunications services. As of October 1, 1997, more than 398,074 of these services were being resold throughout BellSouth's region.

- Other retail telecommunications services, although not actually ordered by CLECs to date, are functionally available for resale. Testing has been conducted to verify the availability of services that include, but are not limited to, E-911, LightGate service, SmartPath service, and SmartRing service. The tests confirm that a correct bill will be generated.

- BellSouth is aware of only two problems in its billing systems affecting the accuracy of bills from BellSouth to CLECs for resold services, and both problems have been corrected.

  - Incorrect discount levels resulted from a billing program limitation which has since been overcome. The ability to apply CLEC-specific discount levels was incorporated into Release 97.3 of BellSouth's Customer Records Information System (CRIS) which is used to perform billing to CLECs for resold services.

  - The second problem affected the proper application of discounts to non-recurring charges associated with resold services. Here again, the problem resulted from a program limitation which has been corrected. Appropriate changes to the billing system were made in all BellSouth states except Tennessee, where BellSouth is not required to discount non-recurring charges.