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BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

June 9, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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DOCKET FILE COPY ORIGINAL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: Written Ex Parte in:
CC Docket No. 97-208, CC Docket No. 97-231,
CC Docket No. 97-121, CC Docket No. 97-137,
CC Docket No. 96-98, and CC Docket No. 98-56

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has responded today in a written ex parte to requests for information not previously included in the record of any of the proceedings listed above. The staff made its request for this information at a meeting with representatives of BellSouth Corporation that occurred on May 26, 1998. We have already filed with you the required notice of this meetings, at which we discussed issues related to the requirements of Sections 251 and 271 the Communications Act of 1934, as amended.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the above-referenced proceedings.

Sincerely,

Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment

cc: Carol Mattey
Joe Welch

BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

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June 9, 1998

Ms. Carol Mattey, Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: Written Ex Parte in:
CC Docket No. 97-208, CC Docket No. 97-231,
CC Docket No. 97-121, CC Docket No. 97-137,
CC Docket No. 96-98 and CC Docket No. 98-56

Dear Ms. Mattey:

On May 26, 1998, representatives of BellSouth met with you and your staff to discuss issues relating to BellSouth's compliance with the requirements of Section 271(c)(2)(B). At that time the staff asked for the information included as an Attachment to this letter.

If after reviewing the attachments your staff concludes that it needs additional or different information, please call me at (202) 463-4113.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we have filed with the Secretary of the Commission two copies of this written ex parte presentation in each of the proceedings listed above.

Sincerely,

Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment

cc: Joe Welch

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

ADMINISTRATIVE SESSION

47 Trinity Avenue
Atlanta, Georgia

Tuesday, April 21, 1998

The Administrative Session was called to order pursuant to Notice at 10:10 a.m.

Present were:

MAC BARBER, Chairman
BOB DURDEN, Vice Chairman
STAN WISE, Commissioner
ROBERT BAKER, Commissioner
-and-
DAVE BAKER, Commissioner
(by teleconference)

1 (Commissioners D. Baker, S. Wise, R. Baker, R.
2 Durden and M. Barber present and voting.)
3 CHAIRMAN BARBER: Let us go now to R-9, Docket
4 Number 8354-U. Chair recognizes -- Yeah, David, recognize
5 yourself.
6 MR. BURGESS: Good morning, Mr. Chairman. This is
7 David Burgess with the Commission Staff.
8 Item Number R-9 is 8354-U. This is the Public
9 Service Commission's investigation into the development of
10 electronic interfaces for BellSouth Telecommunications
11 Operations, the company's operational support systems, and
12 specifically this is consideration of decision in the matter
13 of the Staff's workshop report and recommendation.
14 This proceeding was established as a result of the
15 Commission's order issued in Docket Number 7253-U, which
16 dealt with BellSouth's revised SGAT. In that October 30,
17 1997 order the Commission directed the Staff to conduct a
18 technical workshop to discuss and propose any necessary
19 enhancements to BellSouth's OSS systems that would aid CLEC's
20 entry into the local exchange market.
21 The Commission also in that order directed the
22 Staff to file a report with the Commission summarizing its
23 recommendations within 14 days after the conclusion of that
24 workshop. The first notice of the workshop was issued on
25 November 14, 1997. In that notice CLECs were given an

1 opportunity to file comments regarding BellSouth's OSS
2 systems. BellSouth was allowed to respond to those comments
3 filed by the CLECs on December 2nd. After reviewing the
4 initial comments that were filed in this proceeding, the
5 Staff used these comments as a framework for the issues to be
6 discussed in the context of the workshop. The workshop was
7 held on December the 9th and the 10th, and during the
8 workshop the Staff discussed some 100 issues -- approximately
9 100 issues that were brought to the Staff's attention by the
10 parties.
11 At the conclusion of the workshop the Staff issued
12 a report on December 23, 1997. That report was in the form
13 of a matrix which contained the Staff's direct
14 recommendations and proposed solutions, implementations for
15 those solutions. The parties were allowed an opportunity to
16 comment to the Staff report. After receiving those comments,
17 this Commission conducted evidentiary hearings during March
18 18th through the 20th. The parties filed briefs in the
19 matter on March 30th, and the matter is ready for decision
20 this morning.
21 In this case the Staff specifically recommends that
22 the Commission adopt the Staff's report in total and issue an
23 order that will cause BellSouth to fully comply with all the
24 recommendations and implementation dates contained within the
25 Staff's report.

1 The Staff further asks that this Commission order
2 BellSouth to comply with some of the implementation dates
3 which have passed or which will already have passed by the
4 time this Commission issues an order in this matter.
5 And the third thing the Staff is asking, that the
6 Commission also approve the revised schedule as contained
7 within the report that would cause the industry to file
8 surveillance reports with this Commission updating the
9 Commission on the progress of the implementation of the
10 Staff's proposed solutions, as well as we feel like this
11 format will offer a good venue for effective continual
12 conversations occurring among the parties.
13 One final note, I would like to say that BellSouth,
14 in the Communications Committee meeting, raised an issue
15 regarding cost recovery for these enhancements. I want to
16 direct the Commission's attention to the order that the
17 Commission issued in docket 7061-U, which was a cost study
18 docket in which the Commission said in that order that
19 BellSouth would submit to this Commission a compilation of
20 the costs of these OSS systems and the Commission would
21 review that cost data and determine an appropriate rate
22 recovery mechanism for such.
23 So with that, I'll answer any questions the
24 Commission might have of me.
25 COMMISSIONER R. BAKER: With that, I don't believe

1 the Commission will have any questions -- Oh, well, I was
2 wrong.
3 The Chair recognizes Mr. Robert Baker.
4 COMMISSIONER R. BAKER: The Staff's recommendation,
5 Mr. Burgess, is to take up at a later time any requests for
6 cost recovery that may be made by BellSouth due to
7 expenditures associated with the necessary enhancements
8 requested by the CLECs?
9 MR. BURGESS: More specifically, Commissioner
10 Baker, the Commission's order directs BellSouth to file with
11 this Commission a compilation of that cost in the context of
12 7061-U, and the Commission will conduct its review of those
13 costs and determine an appropriate rate recovery mechanism
14 for such costs.
15 COMMISSIONER R. BAKER: Thank you, Mr. Burgess.
16 CHAIRMAN BARBER: Gentlemen, any further questions
17 of Mr. Burgess?
18 COMMISSIONER D. BAKER: Mr. Chairman?
19 CHAIRMAN BARBER: The Chair recognizes Mr. Dave
20 Baker.
21 COMMISSIONER D. BAKER: Mr. Burgess, I've got a
22 couple of little items I need to ask you about. Can you hear
23 me okay?
24 MR. BURGESS: Yes, sir.
25 CHAIRMAN BARBER: You are coming through loud and

1 clear.

2 COMMISSIONER D. BAKER: Let me say first and

3 foremost that I think you and the Staff did an outstanding

4 job of organizing these workshops and putting together this

5 matrix -- or this recommendation in the form of a matrix, and

6 let me say that I support it.

7 One or two tweaks I want to ask you about. Page 1,

8 Pre-ordering, Item 2, Customer Service Record, Proposed

9 Solution B. Are you with me?

10 MR. BURGESS: Yes, sir.

11 COMMISSIONER D. BAKER: You say, BST shall make

12 this information available via fax and electronically through

13 LENS.

14 Mr. Chairman, I am not making a motion, but I would

15 be more comfortable if we did not have a reference to via

16 fax. The reason being, anything that can be sent via fax can

17 also be sent through the web base interface of LENS, so there

18 would be no reason to send via fax, and I don't want us to

19 get in a situation where a fax is sent, but there is no

20 electronic communication, and therefore, partial compliance

21 is claimed.

22 And then on page 2 I have two questions for you.

23 COMMISSIONER WISE: Well, let's take them one at a

24 time.

25 MR. BURGESS: Mr. Chairman, my response --

1 CHAIRMAN BARBER: Chair recognizes Mr. Burgess.
2 MR. BURGESS: Commissioner Baker, at the choice of
3 several of the CLECs, they submit their orders through the
4 fax mode. They do not use the electronic OSS system. It is
5 by their choice and they choose in some cases to have the
6 customer service record faxed to them rather than utilize the
7 electronic interfaces. So it is an option to the CLEC. It's
8 at the CLEC's request that they have also the opportunity to
9 submit their orders through fax, via fax, as well as receive
10 their customer service record through fax. They simply did
11 not choose to use the electronic systems.
12 COMMISSIONER D. BAKER: Okay. Well, then, you've
13 answered that question to my satisfaction. Thank you.
14 CHAIRMAN BARBER: Mr. Dave Baker, then, the
15 reference to via fax is settled?
16 COMMISSIONER D. BAKER: Correct. Thank you.
17 CHAIRMAN BARBER: Thank you. Let's go to the
18 second question.
19 COMMISSIONER D. BAKER: At page 2, Proposed
20 Solution B. The potential issue is failure to provide
21 information regarding promotional offerings. The proposed
22 solution is somewhat vague in that it says, BST is currently
23 providing this information in a paper format and will
24 determine whether an electronic version can be provided.
25 Where are we on that?

1 MR. BURGESS: Commissioner Baker, my understanding
2 is that the information is being provided electronically now
3 on the web page. So CLECs can access the promotional
4 offerings off of the web page. The information is up and
5 running.
6 COMMISSIONER D. BAKER: Okay. So that is
7 available?
8 MR. BURGESS: It is available. That's correct.
9 CHAIRMAN BARBER: Mr. Dave Baker, is that a
10 satisfactory response to your second inquiry?
11 COMMISSIONER D. BAKER: Yes, it is. Thank you.
12 Last question, Mr. Burgess. Same page under the
13 Implementation Time Frames, down on Item H.
14 MR. BURGESS: Yes, sir, I'm with you.
15 COMMISSIONER D. BAKER: Pre-ordering, Item 3-H.
16 The implementation time frame is scheduled for the end of
17 1998, and that's later than almost any other deadline in the
18 implementation time frame. Everything else is basically
19 first quarter of '98 under the old time frame. Why is this
20 so much later?
21 MR. BURGESS: Couple of reasons, Mr. Chairman.
22 This interface is in the very early development stages. I
23 think one thing that was expressed by the participants in the
24 workshop is, the CLECs wanted to have some input in the
25 process in determining exactly what this interface would look

1 like. I think one of the reasons why we extended this time
2 frame to the end of the year was to ensure that when this
3 interface is built that CLECs will have an opportunity to
4 have their say-so and ensure that the functionalities that
5 they desire are included in the API interface, and my
6 understanding is that while we've given a date here as of the
7 end of 1998, the possibility lies that this interface may be
8 online in the late September, early October time frame. But
9 we put this date in here. We felt that the end of 1998 was
10 appropriate based on the conversations that we had at the
11 workshop.
12 COMMISSIONER D. BAKER: Thank you. You've answered
13 my third and final question, and Mr. Burgess, I appreciate
14 your straightforward answers, and Commissioners, I appreciate
15 your indulgence in letting me have this little exchange.
16 CHAIRMAN BARBER: Thank you, Mr. Dave Baker, for
17 your inquiries.
18 Any other inquiries or questions of Mr. Burgess?
19 (No response.)
20 CHAIRMAN BARBER: Any comments concerning docket
21 number 8354-U?
22 (No response.)
23 CHAIRMAN BARBER: Then are you ready for the
24 question? Any objection for approving the Staff report in
25 this docket?

1 (No response.)

2 CHAIRMAN BARBER: The Chair hears no objection.

3 Let the record show then that this docket has been approved

4 unanimously. Thank you.

5 (Commissioners D. Baker, R. Baker, R. Durden, S.

6 Wise and M. Barber present and voting.)

7 CHAIRMAN BARBER: Thank you, Mr. Burgess.

8 Let us go now to R-10, Docket Number 7253-U. Mr.

9 Sewell.

10 MR. SEWELL: Dennis Sewell of the Commission Staff.

11 R-10 is Docket Number 7253-U. It is BellSouth

12 Telecommunications consideration of revised and updated

13 Statement of Generally Available Terms and Conditions and

14 BellSouth's anticipated notice of its Section 271 Application

15 under the Telecommunications Act of 1996.

16 We're asking that the Commission approve the

17 scheduling order for both 7253-U and 6863-U.

18 The first one which is Docket Number 7253-U, we're

19 asking for a single round of comments as opposed to going to

20 a full hearing on this again, and we are also asking that

21 those who filed comments in this will be in compliance with

22 the Commission's data request in docket number 5778-U. We

23 ask that these comments be filed with the Commission by May

24 8, 1998, and also that these comments be limited to those

25 sections of 251 and 252 of the Telecommunications Act

Docket No. 8354-U
Georgia Public Service Commission OSS Workshop
Summary of Staff Recommendations
December 23, 1997; Updated February 19, 1998

PRE-ORDERING

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	BELLSOUTH RESPONSE
1. RSAG/LENS			
a. Download of RSAG has not been provided.	a. BST shall make download of RSAG available, and provide for periodic updates of information.	a. January 30, 1998	a. Adopted. BellSouth has agreed to provide a download of RSAG to MCI provided MCI agrees to pay the cost associated with downloading the database. Once the cost issue is addressed, BellSouth will provide the download to MCI.
b. Information provided to BST (e.g. Connect Through and QuickServe) is not provided to CLECs.	b. Not an issue (BST providing through LENS browser, CGI interface, and EC-LITE).	b. N/A	b. N/A
c. Requires multiple screen process and repeated address validation.	c. BST has stated that it will revise this inquiry process.	c. January 30, 1998	c. Adopted with change to implementation timeframe to February 2, 1998. DONE.
d. Human to machine interface requires dual entry of info.	d. Proposed API interface will alleviate many of these problems.	d. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)	d. Not adopted. See written response for explanation.
2. Customer Service Record			
a. Not given access to the same CSR information BST uses and are limited to printing 50 pages.	a. BST currently limits its retail operation to a 54 page print limit. The proposed API interface will eliminate this current limitation.	a. January 28, 1998 (Vendor selected) (Implementation by the end of 1998)	a. Adopted. API will implement an agreed to method to print CSR pages.
b. Rates of services and equipment items displayed on CSR are not presented in LENS.	b. BST shall make this information available via fax and electronically through LENS.	b. January 30, 1998	b. Not adopted. See written response for explanation.

c. No "refer to" number is provided on certain CSRs. CLECs must call LCSC to obtain the number.	c. Not an issue	c. N/A	c. N/A
3. Limited Products and Services			
a. A complete list of all valid "USOCs" has not been provided to the CLECs.	a. BST shall make a complete list of valid USOCs available to CLECs and provide monthly updates to this information.	a. January 30, 1998	a. Adopted.
b. Failure to provide information regarding promotional offerings.	b. BST is currently providing this information in a paper format and will determine whether an electronic version can be provided.	b. December 17, 1997 (Notice of Availability)	b. Adopted with change to implementation timeframe. BellSouth will determine whether an electronic version of all USOCs can be provided by January 30, 1998. DONE.
c. Failure to provide blocks of DID numbers and DID trunk inquiry	c. BST shall make blocks of ten DID numbers available electronically.	c. March 30, 1998	c. Adopted with change to implementation timeframe to June 30, 1998 for EC-Lite, August 30, 1998 for API, December 31, 1998 for LENS.
d. Lack of accurate PSIMS information and is received by batch file.	d. BST shall make accurate information available in PSIMS.	d. January 30, 1998	d. Adopted with change to implementation timeframe to June 30, 1998 for LENS, August 30, 1998 for API.
e. LENS is not designed to accommodate Unbundled loop and certain complex resale orders.	e. This issue is addressed in 1a of Ordering.	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	e. See Ordering Issue 1a.
f. PIC information is not listed in an efficient manner.	f. BST shall add a search capability for PICs in LENS.	f. March 30, 1998	f. Adopted with change to implementation timeframe to December 31, 1998. In order to ulitize this feature, CLECs will need to enable the JAVA feature on the Netscape browser.
g. ESSX and MultiServe information is not available.	g. This issue is addressed in 1g of Ordering.	g. March 30, 1998	g. See Issue 1g.
h. LENS is limited to a maximum of 6 lines per residence or business request	h. The proposed API interface will eliminate these limitations.	h. End of 1998	h. See response to Pre-Ordering issue 1d and

and a maximum of 20 features per line.			written response for explanation.
4. Telephone Number Resources			
a. Limits number reservation to six numbers/LENS session and 100 numbers/end office.	a. BST is removing 100 number limit for LENS and EC-Lite.	a. January 5, 1998	a. Adopted with change to implementation timeframe to January 30, 1998. DONE January 15, 1998.
b. BST's RNS system automatically generates a telephone number to offer a customer but CLECs must use telephone number reservation in LENS.	b. BST is providing telephone number availability in a sufficient manner.	b. N/A	b. N/A
c. CLECs cannot determine NXX codes available to offer customers.	c. This information is currently provided in LERG. The proposed API interface will also make this information available.	c. N/A	c. N/A
d. BST does not provide parity of access to vanity numbers.	d. BST is providing vanity number availability in a sufficient manner.	d. N/A	d. N/A
e. BST does not enable CLECs to hold a telephone number for 30 days without using cumbersome (firm order mode) of LENS. In the (inquiry mode) CLECs may only make reservations for 9 days.	e. BST shall make 30 day number reservation available to CLECs.	e. March 30, 1998	e. Adopted. See written response for condition. DONE February 6, 1998.
f. ATLAS information is received by a periodic file data transfer.	f. Not an issue.	f. N/A	f. N/A
5. Due Dates			
a. Access for calculation of due date is not available.	a. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	a. April 30, 1998	a. Adopted with change to implementation timeframe to December 31, 1998.

b. Dates gi are not firm, also the date is assign by BellSouth after it is entered i BellSouth's system.	b. This issue is addressed in 2i of Ordering.	b. January 30, 1998	b. See Ordering Issue 2I
c. If technician is needed, it would not be known to the CLEC. Technician time could be wasted.	c. Not an issue (Connect-Through and Quick Serve will solve the problem).	c. N/A	c. N/A
d. Limited appointment time.	d. BST is providing this information in a sufficient manner.	d. N/A	d. N/A
e. Access to dedicated facilities info available only after due date is assigned.	e. This information is presently being provided through Quick Serve, and the proposed API interface will address this issue long-term.	e. N/A	e. N/A
f. Changes to due date requires a phone call to LCSC.	f. This issue is addressed in 4a of Ordering.	f. N/A	f. N/A
g. Firm Order Confirmation delays.	g. This issue is addressed in 2i of Ordering.	g. January 30, 1998	g. See Ordering Issue 2i
6. Editing Capabilities			
a. BellSouth relies upon machine to human interactions.	a. This issue is addressed in 4a of Ordering.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	a. See Ordering Issue 4a
b. Prevent on-line edit checks, order rejects and must be resubmitted.	b. This issue is addressed in 4a of Ordering.	b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	b. See Ordering Issue 4a.
7. System Capacity			
a. RSAG and LENS lack sufficient capacity to meet reasonable demand.	a. BST is installing new software to resolve this problem.	a. December 12, 1997	a. Adopted. Documentation submitted.
b. System Lock-Out and Time-Out	b. BST is installing new software to resolve this problem.	b. December 12, 1997	b. Adopted. New software installed.
8. Systems Integration			

a. LENS is an interim system that does not provide machine to machine access to BST's legacy systems.	a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	a. LENS specifications provided December 12, 1997	a. Adopted. Specifications have been provided.
b. LENS pre-ordering interface is not integrated with its EDI ordering interface.	b. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	b. CGI specifications available December 15, 1997	b. Adopted. Specifications have been provided.
c. BST has failed to provide real-time machine to machine access to Direct Order Entry Support Applications Program ("DSAP")	c. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	c. December 31, 1997	c. Adopted. Specifications have been provided.
d. Technical specifications have not been provided to CLECs so they can transfer information into their systems without manual intervention.	d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate.	d. December 31, 1997	d. Adopted. Specificaitons have been provided.

MAINTENANCE AND REPAIR

POTENTIAL ISSUE	PROPOSED SOLUTION	IMPLEMENTATION TIME FRAME	BELLSOUTH'S RESPONSE
1. Limited Application			
a. Electronic Bonding Interface (EBI) only provides full service for access special circuits.	a. BST is implementing EBI with AT&T.	a. February 2, 1998	a. Adopted. Date moved to March 2, 1998 at AT&T's request.
b. TAFI only supports basic local exchange services. All others require manual intervention by BST personnel.	b. EBI will accommodate all services.	b. February 2, 1998	b. Adopted. Date moved to March 2, 1998 at AT&T's request.
2. Electronic Capabilities			
a. BST has not provided EBI for telephone number-based service.	a. BST shall provide TAFI specifications to CLECs.	a. January 30, 1998	a. Adopted. EBI does support telephone number based services.
b. No electronic capability to send/receive status on any local telephone service.	b. Implementation of EBI will address this issue.	b. February 2, 1998	b. Adopted. Date moved to March 2, 1998 at AT&T's request.

. Electronically issued orders are manually entered into BST system.	c. Implementation of EBI will address this issue.	c. February 2, 1998	c. Adopted. Date moved to March 2, 1998 at AT&T's request.
3. System Capacity			
a. TAFI lacks sufficient capacity to meet demand (i.e. simultaneous users).	a. BST will add capacity to accommodate more users as needed.	a. As needed	a. Adopted.
4. Long Term Solution			
a. EBI-long term is not in place.	a. BST shall implement EBI. BST is not required to make enhancements to TAFI.	a. February 2, 1998	a. Adopted. Date moved to March 2, 1998 at AT&T's request.
5. Integration			
a. BST failed to provide technical specifications for CLECs' TAFI integration.	a. BST will provide specifications for TAFI to CLECs.	a. January 30, 1998	a. Adopted. The specifications have already been provided.
b. TAFI and LENS are not integrated.	b. BST does not integrate TAFI with its retail pre-ordering and ordering systems. BST will provide specifications for TAFI and LENS to CLECs so that they may perform their own system integration.	b. January 30, 1998	b. Adopted.

ORDERING

1. Limited Product and Services			
a. LENS is not designed to accommodate unbundled loop and certain complex resale orders.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	a. BellSouth adopts the solution and the proposed timeframe. If carriers want the ability to electronically order unbundled loops then EDI is the appropriate interface.
b. Limited pre-ordering and ordering gateway interface (provided by LENS and EDI) to the BellSouth resources that link to its legacy systems.	b. BST shall provide e-mail capabilities for pre-ordering and ordering complex services initially. This is in addition to the current fax capability.	b. January 30, 1998	b. See written response for BellSouth's proposal. If the Change Management team agrees upon parameters, implementation timeframe will be April 30, 1998.
c. LENS and EDI support only some	c. BST in conjunction with carriers will	c. March 30, 1998	c. Adopted

resale services.	present this issue of mechanized complex orders to OBF.		
d. Failure to use industry standard feature identification codes.	d. Not an issue	d. N/A	d. N/A
e. Failure to provide a fully automated system for placing complex orders.	e. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	e. March 30, 1998	e. Adopted.
f. Inability of new entrants using Phase I EDI to order all services that BST now orders electronically to support its retail operations, i.e. cannot be used to order private line, Centrex, ISDN, or complex business services or unbundled network elements.	f. Issue addressed in 1a, 1b, and 1c.	f. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	f. See Ordering Issue 1a, 1b and 1c.
g. No provision for odering capabilities for Centrex, some ISDN, MultiServ, Complex Services, private line services other than Synchronet, or all unbundled network elements when Phase II EDI interface is implemented.	g. BST in conjunction with carriers will present this issue of mechanized complex orders to OBF.	g. March 30, 1998	g. Adopted.
h. EXACT designed for access, not local service, thus only part of the customers service, such as the loop, can be ordered electronically; the remainder of the customers order, for items such as E911, directory listings, interim number portability, etc. must be ordered through another interface such as EDI or via fax.	h. Not an issue.	h. N/A	h. N/A
i. CLEC orders placed through LENS are currently limited to a maximum of six lines per residence or business request,	i. Issue addressed in 3h of Pre-Ordering	i. End of 1998	i. See Pre-Ordering Issue 3h.

and a maximum of twenty features per line.			
2. Order status			
a. LENS and EDI have not led to faster provisioning of simple LSRs.	a. Not an issue at this time.	a. N/A	a. N.A
b. Communication processes fail to adequately advise CLECs of the status of orders placed via the electronic gateways.	b. Not an issue at this time.	b. N/A	b. N/A
c. Sufficient notices not provided to CLEC e.g. service jeopardies, rejects competitive disconnects, circuit based services.	c. In the interim, BST will work with carriers on the provision of timely notices.	c. January 30, 1998	c. Adopted.
d. Treatment of CLEC orders as two orders - one to disconnect and one to reconnect.	d. BST is installing software to resolve this issue. BST will verify memory call item is resolved also.	d. January 5, 1998	d. Adopted with change to implementation timeframe to January 12, 1998. DONE.
e. Failure to provide adequate flow-through for POTs resale and UNE orders.	e. BST will share edits and all scenarios which produce order fall out for manual processing.	e. December 19, 1997	e. Adopted. BellSouth will share all edits on or before January 30, 1998. DONE.
f. Failure to disclose internal editing and data formatting requirements.	f. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	f. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	f. Adopted.
g. Failure to provide sufficient order summaries and/or an order summary screen.	g. BST and the CLECs have committed to resolve this issue.	g. First Quarter 1998	g. BST will work with CLECs to resolve this issue. Implementation timeframe change to December 31, 1998.
h. No means for CLECs to access and view pending orders.	h. BST and the CLECs have committed to resolve this issue.	h. First Quarter 1998	h. Adopted with change to implementation timeframe to November 1, 1998 for API, December 31, 1998 for EDI.
i. Lack of a system that provides adequate FOC information - the 'soft' FOC	i. BST shall provide the same guarantee of FOC information to CLEC that it	i. January 30, 1998	i. Adopted.

before facility availability is determined is inadequate.	provides to its retail operations.		
j. EDI not fully automated, e.g. more than two-thirds of orders placed through its electronic interfaces fall out for manual processing.	j. BST will share edits and all scenarios which produce order fall out for manual processing.	j. December 19, 1997	j. Adopted. BellSouth will share all edits on or before January 30, 1998. DONE.
k. EDI not capable of electronically transmitting necessary provisioning notices, i.e., error notices, reject notices, jeopardy notices, status reports.	k. In the interim, BST will work with carriers on the provision of timely notices.	k. January 30, 1998	k. Adopted.
l. All necessary business rules not provided to CLECs; rules in LEO Guide in error or internally inconsistent.	l. BST shall provide business rules for CLECS for Version 7.0 of EDI, LEO, LESOG and SOER.	l. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	l. Adopted.
m. Batch processing is not real-time or near real-time for ordering.	m. BST will explore event-driven EDI with AT&T and MCI.	m. First Quarter 1998	m. Adopted.
n. Access to dedicated facility information is available only after the due date is assigned and not before which would enable a representative to immediately offer the same-day service on a new install that does not require an additional line.	n. BST shall provide a full due date calculation capability in the pre-ordering mode of LENS.	n. April 30, 1998	n. This issue appears to be identicial to Pre-ordering issue 5e and BellSouth agrees with the staff's proposal in issue 5e.
3. Level of Manual Intervention			
a. Substantial number of LSRs placed via EDI being handled manually.	a. Issue addressed in 2e and 2j.	December 19, 1997	a. See issues 2e and 2j.
b. No working EDI interface for ordering.	b. Not an issue.	b. N/A	b. N/A
c. EDI-PC not fully automated.	c. Not an issue at this time.	c. N/A	c. N/A
d. Process for ordering unbundled	d. BST shall provide business rules to	d. March 16, 1998 for Version 7.0	d. Adopted

network elements through LENS (information is entered into the "Remarks" section of the order screen and is manually retrieved and re-entered by BST).	CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	January 30, 1998 for LEO, LESOG and SOER	
e. Availability of an electronic interface that does not require manual intervention for the provisioning of unbundled loops.	e. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER	e. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	e. BellSouth adopts solution and timeframe, but notes that the solution may not directly address the issue presented.
4. *Edit Capabilities*			
a. Failure to provide electronic edit capabilities with ordering and provisioning at parity with BST. Edit to comply with OBF ordering form requirements or BST business rules.	a. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO LESOG and SOER.	a. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	a. Adopted.
b. Inability to submit change orders (in case of errors, customer changes order, and adding or removing features.	b. BST shall provide business rules to CLECs for Version 7.0 of EDI, LEO, LESOG and SOER.	b. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	b. Adopted. The EDI interface has the ability to submit change orders.
5. System Capacity			
a. Failure to provide systems with sufficient capacity to meet anticipated or reasonable demand.	a. BST has agreed to provide the methodology utilized to calculate present system capacity and its proposed plan for expanding system capacity.	a. December 31, 1997	a. Adopted.
b. Insufficient testing of systems and test documentation.	b. Issue addressed in 1a and 1b of the General Section.	b. January 30, 1998	b. Adopted.
c. Inadequate field for directory listings. Note: Applies to both EDI and EDI-PC for Items 5a and 5c.	c. Issue addressed in 1a and 1b of the General Section.	c. January 30, 1998	c. Adopted.
6. Integration			

a. LENS, EDI, and EDI-PC interfaces are not integrated to provide direct, unmitigated access to BST's legacy systems for pre-ordering and ordering functions.	a. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	a. December 31, 1997	a. Adopted.
b. LENS must be utilized in combination with additional interfaces, such as the TAFI system and EDI-PC in order to meet additional CLEC needs.	b. Not an issue.	b. N/A	b. N/A
c. Insufficient information provided new entrants to develop a system compatible with BST's Phase II EDI.	c. Issue addressed in 2f of Ordering and 1a and 1b of the General Section.	c. March 16, 1998 for Version 7.0 January 30, 1998 for LEO, LESOG and SOER	c. Adopted.
d. LENS, EDI, and EDI-PC require dual entry by entrants into their own ordering/customer records systems.	d. Closed issue (BST will provide system specifications so that CLECs can build their own interfaces to integrate).	d. December 31, 1997	d. Adopted.

BILLING

1. System Capability			
a. BST has failed to provide systems relating to detailed access usage data for UNEs for billing purposes.	a. BST will provide access daily usage file (ADUF).	a. December 31, 1997	a. Adopted. 10/16
b. BST has failed to provide systems to bill for UNEs, including local loops, local transport and switching via CABs or using a CABs format.	b. This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	b. N/A	b. N/A
c. BST does not have the capability to record usage data or generate mechanized bills for many network elements. BST is not capable of providing usage sensitive billing for those UNEs that have usage sensitive	c. BST shall furnish an accurate paper bill in accordance with interconnection agreements.	c. February 15, 1998	c. Adopted.

pricing such as transport, switching and signaling. d. BST cannot electronically transmit originating and terminating recording information for interstate calls and does not know when it will be able to do so. e. BST has failed to provide systems that accurately produce bills for resold services. f. BST has failed to provide systems for accessing usage data for flat rate calls. g. BST is not providing usage rates for Information Service Provider (e.g. NII) calls even though BST agreed to in middle 1996 and are required to by the AT&T/BST Interconnection Agreement. h. BST has failed to provide systems for mechanically generated billing statements.	d. BST will provide access daily usage file (ADUF). e. Not an issue. f. BST will add capability in central offices to capture data for flat rate calls. g. CLECs have the ability to negotiate their own contracts with ISPs. h. BST shall furnish an accurate paper bill in accordance with interconnection agreements.	d. December 31, 1997 e. N/A f. December 1998 g. N/A h. February 15, 1998	d. Adopted. e. N/A. f. Not adopted. See written response for explanation. g. N/A h. Adopted.
2. Billing Accuracies CABs - formatted bills were to be implemented by August 2, 1997. AT&T still has not received accurate CABs bills and remains in testing with BST.	This is a contractual issue and therefore no proposed solution is offered in the context of this technical workshop.	N/A	N/A

GENERAL

1. Notice of Changes a. Insufficient notice of changes.	a and b: BellSouth, AT&T, MCI and Sprint started	a and b: January 30, 1998	a. Adopted.

b. Insufficient documentation of specifications.	a series of meetings on December 11, 1997 to develop a Process Document addressing and resolving these "change management" issues. This series of meetings and development of the document are supposed to conclude by January 31, 1998. One additional CLEC will also be notified so that they can have some input. The parties view this as positive, interactive solution.		b. Adopted.
2. Proprietary Interface a. Interim interface b. Not compatible with industry standard EDI interfaces. c. CLECs cannot integrate preordering and ordering at parity with BST. d. Need for machine-to-machine or Application Programming Interface for preordering.	a through d: EDI & API will be based on industry standards and therefore can be integrated and available for machine-to-machine use.	a through d: EDI version 7.0 by March 16, 1998 API by December 31, 1998	a through d: Not adopted. See written response for explanation.
3. Training a. Usable specs not made available. b. Documentation incomplete, has errors. c. BST personnel lacks adequate training.	a. Issue addressed in 1a and 1b. b. Issue addressed in 1a and 1b. c. Issue addressed in 1a and 1b. Also, BST to provide feedback on orders submitted for CLEC information in training their own staff.	a. January 30, 1998 b. January 30, 1998 c. January 30, 1998	a. Adopted. b. Adopted. c. Adopted.
4. Information Information is not provided to show parity (i.e. CLEC tour of BST facilities).	Not a technical issue to be resolved in this docket.	N/A	N/A