

148. Although BellSouth claims that this same possibility exists for its retail orders, the possibility is much lower than it is for CLECs. BellSouth has an integrated pre-order and order system in which, moments after the customer service representative performs a pre-ordering inquiry for due date availability, an order flows directly into BellSouth's ordering systems and on into SOCS. In contrast, because BellSouth has not provided CLECs with an acceptable integrated pre-order and order system, CLECs must retype the information received at the pre-order stage into their ordering system. The order will then often sit on the CLEC's side of the interface for a period of time. This is because BellSouth's version of EDI is a batch process in which orders are not transmitted as soon as they are entered but rather are transmitted at pre-defined time intervals. Finally, after an order is transmitted, it will often fall out on BellSouth's side of the interface for manual processing, increasing the length of time before it reaches SOCS.

149. BellSouth has made some improvements since its last application but the fundamental problem remains the same. BellSouth has improved the flow-through rate for CLECs somewhat since its last application. However, as I discuss below, the data continue to show that more CLEC orders than BellSouth orders require manual processing. BellSouth is also now considering MCI's request that it move to an event-driven version of EDI in which orders would be transmitted as soon as they are entered; the specifications approved by TCIF in June provide an industry standard means of creating event-driven EDI. But BellSouth has not yet agreed to MCI's request. Finally, BellSouth claims that it has enabled CLECs to integrate their pre-ordering and ordering interfaces, but, as I explained above, the means of integration provided by BellSouth are inadequate. As a result, BellSouth has not corrected any of the causes of the disparity between the ability of its retail operation and the ability of CLECs to provide accurate

due dates. BellSouth also has not changed its pre-ordering systems in any way in an attempt to compensate for this disparity by enabling CLECs to gain access to guaranteed due dates.

**g) BellSouth's Ordering Processes Are Largely Manual**

150. BellSouth has not sufficiently automated its ordering processes. BellSouth has not automated ordering of partial migrations (for UNE orders). As of today, BellSouth has not automated ordering for Local Number Portability (LNP). BellSouth also has not automated ordering of complex directory listings. In addition, all orders for combinations of unbundled elements that the CLECs desire to combine themselves, as well as all orders for complex resold services, have to be placed manually. Moreover, even those orders that BellSouth claims are automated, such as ordering of resold POTS service and associated features, do not flow through in sufficient quantities to provide ordering parity.

151. This Commission has required BOCs to demonstrate that they are providing nondiscriminatory access to all modes of competitive entry, including unbundled elements. (Ameritech MI Order, ¶¶ 133, 159). At this time, BellSouth only provides automated ordering through EDI for four unbundled elements -- loops, ports, interim number portability and loops plus interim number portability. (Stacy OSS Aff. ¶ 118). What BellSouth does not make clear from the present filing is that the only loops that can be ordered through EDI are 2-wire analog voice grade, and the only ports that can be ordered are 2-wire analog voice grade. BellSouth has not automated the ordering of any unbundled digital loops. Moreover, BellSouth does not present any data to support its contention that even the UNE orders it claims are automated flow through its systems without manual intervention. BellSouth has acknowledged that even orders of 2-wire analog loops fall out for manual processing by the BellSouth account team when the CLEC

desires to order fifteen or more loops. In fact, the CLEC must call the account team before placing such an order in order to put a special number on the order that indicates it should be handled by the account team.

152. BellSouth has not automated the ordering of partial migrations (“split accounts”) for any UNE orders. BellSouth informed MCI of this fact on July 30. Previously, BellSouth had indicated that partial migrations could be ordered via EDI with some designated exceptions. This is a fundamental problem. MCI estimates that more than half of the orders it receives after commercial launch could be partial migrations. This is because business customers are reluctant to transfer their entire account to a CLEC until they have some experience with the CLEC’s service. Ameritech’s failure to provide for flow through of resale orders for split accounts was one reason that this Commission rejected its section 271 filing. (Ameritech MI Order, ¶ 179). BellSouth’s requirement that CLECs manually place all UNE orders for split accounts should lead to a similar rejection.

153. BellSouth’s current assertion of automation does not extend to permanent number portability (LNP) or orders for loops with LNP. As I have already discussed, BellSouth has not yet automated provisioning notices for LNP orders. But the problem extends even further than this. As of today, BellSouth has not even automated the ordering process for such orders. As a result, during the testing that has occurred so far, BellSouth has only visually inspected MCI LNP orders for accuracy. Although BellSouth claims that it will be capable of receiving LNP orders via EDI by the time that MCI launches in September (simultaneous with BellSouth’s migration to LNP), there is no way to know for sure. If BellSouth is unable to fulfill its promise, then MCI will be in a major bind. MCI desires to order LNP on the vast majority of its orders for loops

where LNP is available. If MCI cannot order LNP via EDI, it will be forced to place such orders manually. Unless BellSouth succeeds in automating the ordering of LNP, MCI's entire process of EDI development for UNEs will have been rendered largely useless.

154. BellSouth also lacks an automated process for placing orders via EDI when a customer desires a new directory listing and that listing is complex. Unlike later versions of EDI, EDI 7.0, the industry standard version that BellSouth has implemented, does not contain an automated process for ordering complex directory listings, a type of listing desired by many business customers. As a result, such listings have to be ordered manually. The only time this is not so is if the customer has an existing directory listing and does not wish to change it; in such instances, BellSouth has recently agreed to allow CLECs to place automated orders to maintain their directory listing as-is. But this process does not apply to any customer that is ordering telephone service (and hence a directory listing) for the first time. It also does not apply to existing BellSouth customers who wish to migrate to a CLEC and to change their directory listing. In each of these instances, BellSouth requires the CLEC to place a manual order for a directory listing.

155. This manual ordering process for complex directory listings is a problem in and of itself. In addition, when MCI submits a loop/LNP order to migrate a customer who wants to change his complex directory listing, BellSouth requires MCI to submit the entire order manually. Even after BellSouth has implemented an automated ordering process for loops with LNP, MCI will be unable to submit the loop/LNP order via EDI and submit the complex directory listing manually. MCI has requested that BellSouth allow MCI to transmit the order for the loop with LNP via EDI and transmit the directory listing order manually; after all, even if both could be

transmitted via EDI, the loop and directory listing would constitute two separate orders that would have to be associated. Nonetheless, BellSouth has refused. Hence, when complex directory listings must be submitted manually, the loop with LNP order must be transmitted manually as well. As a result, BellSouth's ordering processes for UNEs are not sufficiently automated.

156. BellSouth also lacks adequate OSS for ordering combinations of unbundled elements. BellSouth acknowledges that it has refused to adopt the modifications needed to enable its systems to handle combinations of UNES that it considers to replicate retail services (e.g. loop plus port) as UNES -- preventing CLECs from using one method of competitive entry. (Stacy OSS Aff. ¶ 102). BellSouth also fails to offer the OSS needed to enable CLECs to purchase and then recombine themselves basic combinations of network elements, such as loop plus port. Therefore, even under its own view of the combinations that CLECs are allowed to perform themselves, BellSouth fails to provide OSS to order such combinations. This Commission rejected Ameritech's Michigan application in part because Ameritech had not deployed the necessary OSS to allow CLECs to order, and be properly billed for, combinations of network elements. (Ameritech MI Order, ¶ 160). This Commission also previously expressed its concern with whether "BellSouth has deployed the necessary OSS functions to allow competing carriers to order unbundled network elements in a manner that allows them to be combined." (S. Car. Order, ¶ 145). It noted that BellSouth had submitted no evidence that it had provided OSS to support ordering of elements delivered to a CLEC's collocation space (BellSouth's combinations proposal) to allow for combination. This remains true in this application.

157. Even for those types of orders that BellSouth claims are fully automated, BellSouth's own data refute its claim. BellSouth claims that POTS ordering is automated; yet the data it provides, which are not even specific to EDI, shows that only 63% of orders flowed through in March, 59% in April and 72% in May. (Stacy OSS Aff. ¶ 121; Stacy Perf. Measures Aff., ex. WNS-3). In contrast, BellSouth states that its retail residence flow through is approximately 96%, and that even its business flow through (presumably including the ordering of complex services, something BellSouth retail customers presumably order far more frequently than CLECs have to date) is approximately 83%. (Stacy OSS Aff. ¶ 121). The Commission has stated that a BOC's retail flow through is the relevant benchmark for assessing whether a BOC's flow through is sufficient. (Mich. Order, 178).

158. BellSouth states that flow through of CLEC orders was approximately 82% in May after adjusting for CLEC errors. But this figure, which is primarily based on the relatively simple resale orders that form the bulk of CLEC orders to date, is still significantly lower than BellSouth's retail flow through. Moreover, if BellSouth is going to rely on adjusted flow through for CLEC orders, then it should also rely on adjusted flow through for its own orders. But BellSouth has not adjusted its retail flow through upwards to account for errors made by its service representatives.

159. In any case, as this Commission found with BellSouth's prior applications, BellSouth's adjusted flow through figures are dubious at best. BellSouth adjusts the data using an undescribed methodology based on its perception of which errors in the ordering process were caused by CLECs. But not only is it likely that BellSouth's perception is erroneous, it is also the case that many of the errors BellSouth attributes to CLECs are the result of poor training and

documentation provided by BellSouth, of BellSouth's failure to provide an adequate, integrated pre-ordering and ordering interface, and of its failure to provide CLECs with reasonable access to requested pre-ordering data (such as a download of the RSAG database and FIDs). In short, BellSouth has failed to correct the shortcoming found in Paragraph 29 of the Louisiana Order in which the FCC concluded that "BellSouth has not met its burden of establishing that it is providing nondiscriminatory access, because it has failed to demonstrate that competing carriers are to blame for the high order rejection rates."

160. Indeed, one reason for the high fallout rate is not errors made by CLECs but rather BellSouth's failure to provide automated flow through on resale (which parallels BellSouth's entire manual process for UNE orders for split accounts). Although BellSouth suggests that it has automated POTS ordering, it is clear from the fact that even BellSouth's "adjusted flow through" figures are not 100% that there are some scenarios, other than CLEC errors, in which orders fall out for manual processing. Recently, William Stacy acknowledged one such scenario, and it is almost certain that there are others. Stacy acknowledged that BellSouth has failed to automate resale orders for split accounts (Stacy testimony, Tn. test., p. 252, att. 3). This Commission correctly criticized Ameritech for its manual processing of orders for "split accounts." (Ameritech MI Order, ¶ 179). In the early stages of competition, many customers have proven willing to use CLECs for one of their lines while keeping their other line[s] with the BOC. Failure to automate processing of orders involving split accounts will therefore result in manual processing on a significant number of orders.

161. BellSouth's data on the percentage of orders that involve manual intervention do not appear to be based on orders for anything other than plain old telephone service. BellSouth

acknowledges that orders for the vast majority of complex business services (all but four services) are processed manually -- they are not even sent to BellSouth via EDI, let alone processed without manual intervention. (Stacy OSS Aff., ¶ 136). In a press conference last September, BellSouth listed some of the orders it considers complex. (BellSouth News Release, Sept. 8, 1997, p. 7, att. 15). Complex orders that must be sent manually include basic business services such as Centrex, private lines, and frame relay, all of which could readily be automated.

162. BellSouth also considers all orders for nine lines or more to be complex orders. This is so even if the order is simply for nine POTS lines (or, as explained above, for fifteen or more unbundled loops)! (Calhoun, N.Car. trans., pp. 73-74, att. 9; Fla. trans., pp. 1335-38, att. 10). As a result, most business orders will have to be sent manually.

163. For complex services that are handled manually, BellSouth requires that orders be coordinated with its "account teams." BellSouth expects a CLEC to work with its prospective customer to understand what the customer needs, then for BellSouth to design the service for the customer, and finally for the CLEC to hand the order off to a BellSouth service representative to type the order into the system. But it is simply unrealistic to expect CLECs to be able to compete with BellSouth when BellSouth employees are this integrally involved in the satisfaction of basic requests from major CLEC customers.

164. BellSouth claims that it is not cost effective to mechanize orders for complex services, because of their specialized and complicated nature combined with their relatively low volume of orders. But many "complex" services, such as centrex for a small business customer or data services such as frame relay, for example, are not in fact all that complex and also are ordered in relatively high volumes. Indeed, EDI 8.0, which was approved by the industry more

than a year ago, includes standardized ordering of more complex services than these four. It includes ordering of resold ISDN primary rate interface, private lines and intraLATA frame relay. None of these services, other than basic rate ISDN, has been automated by BellSouth.

165. BellSouth claims that manual processing of complex orders provides parity, because BellSouth processes complex orders manually for its retail customers as well. (Stacy OSS Aff. ¶ 138). But BellSouth's state-level OSS witness, Gloria Calhoun, acknowledges that she has not undertaken a service by service comparison to determine that this is true. (Calhoun, Fla. trans., p. 1248, att. 10 (stating that there may be services a BellSouth customer service representative can order electronically that a CLEC cannot)). As currently structured, a BellSouth retail customer coordinates its order with a BellSouth "specialist" who then enters the orders into BellSouth's RNS or DOE systems, at which point the orders flow through automatically. (Shivanandan Affidavit, ¶¶ 4-8). A CLEC retail customer coordinates with the CLEC, which in turn coordinates with its assigned BellSouth account team, which then enters the orders. There is therefore an extra stage of manual involvement in the process.<sup>21</sup> Even if the amount of manual involvement were the same, however, the involvement of a BellSouth account team at almost all stages of a CLEC order is not equivalent to the involvement of a BellSouth account team at the initial stages of a BellSouth order. The BellSouth account team has every incentive to treat the CLEC orders worse than the BellSouth orders and to use the information to attempt to win back customers. Certainly, until there has been significant experience with

---

<sup>21/</sup> In some cases, a BellSouth customer coordinates with a BellSouth employee who in turn provides a written order to a different employee to enter into the ordering systems. (Shivanandan Affidavit, ¶ 9, 19). This makes the process more like the process for CLECs except that it was BellSouth's choice to design the process this way. BellSouth, unlike CLECs, could easily avoid the extra step of manual involvement.

BellSouth's business processes, there is no way to know that CLEC orders will be treated the same as BellSouth orders. In order truly to provide parity to BellSouth's retail process of account team coordination with a customer and account team entry of the order, BellSouth's ordering process should enable a CLEC to coordinate an order with its customer and then to enter the order itself (at which point it would flow through automatically).

166. There are four types of "complex" orders for which BellSouth claims that it does have the ability to offer through EDI -- PBX trunks, SynchroNet services, multiline hunt groups, and basic rate ISDN. (Stacy OSS Aff., ¶ 136). I do not consider hunting to be a complex order, and it is hard for me to believe that BellSouth handles hunting orders in anything but an automated fashion for its retail customers. In any case, even for these four types of "complex" orders, manual processing is required on BellSouth's side of the interface. (Calhoun test., Fla. trans., p. 1234, att. 10).

167. The Georgia Commission ordered BellSouth to create an e-mail system as an interim solution for ordering of complex services. BellSouth has not yet even put this interim measure into place.

168. Therefore, as of today, BellSouth substantially relies on manual ordering processes for almost all types of orders. This is entirely unacceptable. This Commission rejected Ameritech's section 271 application in large part based on Ameritech's extensive reliance on manual processing which resulted in extensive modification of due dates, backlogged orders, late FOCs and rejection notices, and increased problems at higher volumes of orders. (Ameritech MI Order, ¶¶ 173, 183, 189, 193). It rejected BellSouth's previous applications for similar reasons. Manual ordering processes cause delays when fax or phone lines are busy, and when the BOC

customer service representative who receives the fax or phone call (or EDI order which drops out of EDI) delays entering the information. (Ameritech MI Order, ¶ 178). Manual ordering processes also result in errors when the BOC customer service representative enters incorrect information. In MCI's experience with other ILECs, the use of manual interfaces for ordering has proven consistently disastrous. PacBell's manual intervention in the ordering process has resulted in vast delay in processing orders -- often amounting to months. It has also resulted in innumerable errors, such as loss of customer features during customer migration to MCI and failure to include new MCI customers in the 411 database. These delays and errors are so significant -- and so potentially harmful to MCI's reputation in the marketplace -- that MCI had to tell customers that it could not determine when new service would be turned up and that they could receive service faster from PacBell, and MCI, like other CLECs, has been compelled to reduce the scale of its planned market entry in California. In short, by using manual processes, PacBell has effectively preserved its monopoly market share by forcing CLECs to "voluntarily" scale back marketing efforts as a means of limiting the damage that PacBell's manual processes cause. BellSouth provides no reason to think that its manual ordering processes are any better than those of PacBell.

#### **D. Maintenance and Repair**

169. BellSouth offers two interfaces for maintenance and repair: the T1M1 electronic bonding interface and the Trouble Analysis and Facilitation Interface (TAFI) for telephone number based services (basic local services such as Plain Old Telephone Service). The T1M1, not TAFI, is the industry standard interface. BellSouth does not yet have any commercial experience

with T1M1 despite MCI's efforts to develop that interface. As a result, BellSouth cannot declare that interface to be operationally ready.

170. TAFI is of little use to MCI, which desires primarily to order unbundled loops. While TAFI, in theory, is operational with respect to unbundled ports, (Stacy Aff. ¶ 164) it cannot be used for unbundled loops, unbundled switching, unbundled transport or unbundled dark fiber.

171. In any case, like LENS, TAFI is not a true interface. It does not connect to CLECs' systems and thus requires them to retype trouble tickets from their systems into BellSouth's systems. (Calhoun test., Fla. trans., pp. 1225-29, att. 10). As with LENS, this inevitably creates delay and increases errors, and forces CLECs to use BellSouth designed screens.

172. More important, as a proprietary offering, TAFI simply costs too much to be worthwhile for national CLECs like MCI to build to, train their employees on, and periodically have to upgrade. In addition, because a CLEC cannot use TAFI for all maintenance and repair functions, a CLEC would have to use two separate maintenance and repair interfaces just to do business with BellSouth. BellSouth's claim of the superior functionality of TAFI, may hold true for BellSouth, but it ignores all of the disadvantages to CLECs of the fact that TAFI is a proprietary, non-system to system interface.

173. The only acceptable interface that BellSouth offers for maintenance and repair is its T1M1 interface. However, this interface has not yet received any commercial use, because testing was not completed until July 15.

174. BellSouth claims that it has had available an EB interface for local trouble tickets since November 1997. This is not so. MCI and BellSouth began discussing development of an

EB interface last summer. They agreed upon requirements for such an interface and began testing it last December. Testing was originally scheduled to be completed in February but it was beset with problems. These included a period of time during which BellSouth was unable to send information back to MCI (this took six weeks to correct), a period of time in which BellSouth could not create trouble tickets for unbundled loops, and other difficulties. As a result, operational readiness testing was not completed until July 15 -- after BellSouth's had filed its section 271 application. The operational readiness testing included the transmission of trouble tickets in a production environment.

175. With the completion of testing, MCI can now begin submitting actual trouble tickets through the interface. Only successful commercial usage of the interface can truly demonstrate that it is operationally ready. To date, no such commercial usage exists. BellSouth's section 271 application is therefore premature.

#### **E. Billing**

176. The billing function encompasses two discrete sub-functions: daily usage reports that provide the information required to enable CLECs to bill their end users, and monthly bills detailing what the CLEC owes the ILEC.

177. Daily usage feeds are important to MCI, because MCI plans to offer local calling plans in which customers are billed based on their usage of telephone service. BellSouth employs the correct format, EMR, for daily usage feeds. However, BellSouth refuses to provide daily usage feeds for all customers. It will only agree to provide daily usage feeds for customers who CLECs bill based on usage (measured rate customers). But MCI needs the daily usage feed for

all customers so that MCI will know if a particular customer would be better off becoming a measured rate customer and can advise the customer of this fact. The Georgia Commission has ordered BellSouth to provide this information, explaining that "CLECs could use the data to develop and offer innovative services. CLECs could also use the information to better determine where and select in what manner to build their own facilities." (Georgia OSS Order p. 13).

BellSouth has yet to do so.

I declare under penalty of perjury, that the foregoing is true and correct. Executed on August 3, 1998.

Bryan K. Green

A handwritten signature in black ink, appearing to read "Bryan K. Green", written over a horizontal line.

8/3/98

# **ATTACHMENT 1**



**MCI Telecommunications  
Corporation**  
780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

**August 5, 1997**

**Ms. Ilene Barnett  
BellSouth Interconnection  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084**

**Ilene,**

**This letter is in response to our meeting on July 2 at which MCI requested to establish a Joint Implementation Team (JIT) with BST to begin the development of a Pre-Ordering interface using the OBF agreed interim TCP/IP SSL3 protocol.**

**The agreement at that meeting was that BST would provide a response to MCI on regarding our request by July 14<sup>th</sup>. I received a call from Linda Tate during the week of July 21<sup>st</sup> stating that she was still researching our request.**

**MCI is interested in pursuing this development effort but is constrained by BST's lack of response. Please provide your position on establishing a JIT to begin the development of a Pre-Ordering interface using TCP/IP SSL3 by Monday, August 11<sup>th</sup>.**

**Thanks in advance for your immediate attention to this matter.**



**Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515**



**MCI Telecommunications  
Corporation**

780 Johnson Ferry Road  
Suite 500  
Atlanta, GA 30342

August 22, 1997

**Mr. Cliff Bowers  
BellSouth Interconnection  
1960 west Exchange Place Ste. 420  
Tucker, GA 30084**

Cliff,

We are still waiting for a response to our request for establishing a Joint Implementation Team (JIT) to begin development of a Pre-Ordering interface using the OBF agreed interim TCP/IP SSL3 protocol. The original response was due on the 14<sup>th</sup> of July with a second request made on August 5<sup>th</sup>.

I would appreciate a response to our request within the week. Our specifications were shared with Linda Tate on July 14<sup>th</sup> titled Pre-Order Generic Interface Requirements Specifications Draft Version 3. If BST/is not in a position to begin development of the agreed interim protocol, please respond accordingly.

As stated before, MCI is interested in pursuing this development effort but is constrained by BST's lack of response. Thanks in advance for your immediate attention to this matter.

A handwritten signature in black ink, appearing to read "Bryan Green". The signature is fluid and cursive, with a large, sweeping initial "B" and "G".

**Bryan Green  
Sr. Manager  
Systems Implementation  
404-267-5515**

**ATTACHMENT 2**



BellSouth Interconnection Services  
Suite 420  
1960 West Exchange Place  
Tucker, Georgia 30084

770 482-7500  
Fax 770 621-0632

MCI Account Team

**September 16, 1997**

**Mr. Bryan Green  
MCI Telecommunications Corporation  
780 Johnson Ferry Road  
Suite 500  
Atlanta, Georgia 30342**

Dear Bryan,

In your August 5, 1997, letter, you requested that BellSouth establish a Joint Implementation Team (JIT) with MCI to begin the development of a pre-ordering interface using the TCP/IP SSL3 protocol. It is BellSouth's understanding that the ("PreOrdering/Ordering") EDI Over SSL3/TCP/IP is under discussion by the Electronic Communications Implementation Committee [ECIC], and an official ECIC technical implementation guideline for use as an industry standard is not available at this time.

At the September, 1997, ECIC meeting in Kansas City, MO, the Local Ordering subcommittee began discussion of the implementation issues for SSL3/TCP/IP. MCI was in attendance at the meeting and on September 8, 1997, MCI submitted a draft proposal of the implementation flow for discussion in the ECIC. With respect to that proposal, a number of issues were raised. Action items were assigned by the committee to create the implementation guidelines. Pending resolution of the technical issues, the implementation guidelines may be published as early as December, 1997. BellSouth will be glad to discuss the establishment of a JIT with MCI once the ECIC guidelines are available.

Sincerely,

A handwritten signature in cursive script that reads "Cliff Bowers".

Cliff Bowers

**ATTACHMENT 3**

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**Transcript of Proceedings, 5/8/98, Volume IV A**

**PAGE 1 TO PAGE 65**

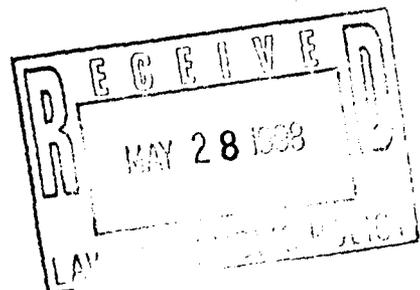
**271 HEARING**

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**CONDENSED TRANSCRIPT AND CONCORDANCE**

**PREPARED BY: TERI A. CAMPBELL, CSR, RPR**

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Page 30

(1) entrant is forced to enter information manually to use  
 (2) the EDI interface for ordering and to import the data  
 (3) into its operations support systems. Entering  
 (4) information manually can lead to significant delays  
 (5) while the customer is on the line, assuming that a  
 (6) carrier wants to complete the order while speaking to  
 (7) the customer. Moreover, whether a carrier completes  
 (8) an order while the customer is on the line, as  
 (9) BellSouth's customer service representatives generally  
 (10) do, or enters the information at a later time, such  
 (11) manual entry of data requires a greater amount of time  
 (12) than BellSouth's retail operation requires. As a  
 (13) result, the need to reenter information may limit a new  
 (14) entrant's ability to process a high volume of orders  
 (15) and would require a new entrant to expend a greater  
 (16) amount of resources than BellSouth to conduct the same  
 (17) number of preordering transactions."  
 (18) Q. Thank you, Mr. Stacy. Would you tell the  
 (19) Authority what BellSouth has provided in this record to  
 (20) demonstrate that it has cured the deficiency noted by  
 (21) the FCC in this paragraph?  
 (22) A. What we provided in this record is, in  
 (23) essence, three things which you saw demonstrated  
 (24) yesterday.  
 (25) We have provided the common gateway

Page 31

(1) interface to LENS which allows the CLEC to develop a  
 (2) machine to machine application that they can then  
 (3) integrate. We have provided the EDI and the PC EDI  
 (4) interfaces to LENS which allows the CLECs to develop a  
 (5) machine to machine ordering application that they can  
 (6) then integrate. And for at least one carrier, we have  
 (7) provided another preordering interface, EC-LITE.  
 (8) So if you back up and look at the whole  
 (9) picture, there are two ways of getting preordering  
 (10) information on a machine to machine basis that can  
 (11) produce an integrated interface as the FCC indicated.  
 (12) The common gateway interface or EC-LITE allows the CLEC  
 (13) to retrieve preordering information, suck it into their  
 (14) computer, manipulate it, write it to their own  
 (15) databases while their service rep is on line real-time,  
 (16) as you saw yesterday. And then the EDI ordering  
 (17) packages, either the small version or the large  
 (18) version, allow them to create an order. And you saw  
 (19) such an order formatted yesterday directly out of a  
 (20) demonstration system that can then be sent to  
 (21) BellSouth.  
 (22) So actually what's in the South Carolina  
 (23) order reflects a poor showing on my part in terms of  
 (24) producing evidence because all of those things were in  
 (25) the record in South Carolina. And in my discussions

Page 32

(1) with the FCC, what's clear is that I didn't prove them,  
 (2) not that they didn't exist then.  
 (3) Q. You may have said this, and I apologize if  
 (4) I'm asking you to repeat. When was the common gateway  
 (5) interface first made available to CLECs?  
 (6) A. It was made available April 28th of '97.  
 (7) The first request we had to use it was sometime in June  
 (8) of that year. That was the first time we delivered the  
 (9) technical data to someone about how to do it.  
 (10) Q. By "technical data," you mean the  
 (11) specifications?  
 (12) A. Specifications. There is a similar set of  
 (13) specifications, the most current one attached as  
 (14) Attachment 1 to my rebuttal testimony. There have  
 (15) been - there was a similar set dated appropriately in  
 (16) June of '97.  
 (17) Q. Were the specs first available only in June  
 (18) of '97?  
 (19) A. They were actually available in April. We  
 (20) first got a request from and delivered them to MCI  
 (21) sometime in June.  
 (22) Q. How were CLECs notified of the availability  
 (23) of the common gateway interface and the specifications  
 (24) associated with it?  
 (25) A. Again, I'm going from memory because that

Page 33

(1) was fully a year ago now. There were a series of  
 (2) carrier notification letters that went out at the time  
 (3) we first put the electronic interfaces on line. And  
 (4) the first time the LENS interface was introduced was  
 (5) April 28th. There were a series of notification  
 (6) letters that went out at that point in time saying LENS  
 (7) is available and a common gateway interface to LENS is  
 (8) available.  
 (9) Q. Could you explain then why NEXTLINK didn't  
 (10) receive notification of this until the technical  
 (11) workshop conducted before this Authority some weeks  
 (12) ago?  
 (13) A. No, I can't.  
 (14) Q. Would you explain to the Authority what API  
 (15) is?  
 (16) CHAIRMAN GREER: I'm sorry. What were  
 (17) the initials?  
 (18) MR. CAMPEN: I believe it's API.  
 (19) Mr. Stacy will correct me if I made a mistake.  
 (20) THE WITNESS: That's correct. API -  
 (21) the initials stand for application program interface.  
 (22) It is another method for allowing two computers to  
 (23) interact on a machine to machine basis. For the  
 (24) comparison, the common gateway interface that we have  
 (25) today is one way for two computers to talk to each

Page 34

(1) other and share information.  
 (2) The API is a technically different  
 (3) method of doing exactly the same thing. EDI is a way  
 (4) of sending an order from one computer to the other and  
 (5) the API is a technically different method of doing  
 (6) exactly the same thing. I'll stop there unless some of  
 (7) you-all want me to go deeper into the technology.  
 (8) BY MR. CAMPEN:  
 (9) Q. Well, could you explain to us what the  
 (10) differences are or relative advantages and  
 (11) disadvantages between the API and the common gateway  
 (12) interface in summary form.  
 (13) A. I'll try. I apologize if I wander off into  
 (14) too many technical terms here.  
 (15) Q. If I could interject, Mr. Stacy, just as a  
 (16) preliminary matter. Perhaps you could answer for us  
 (17) why BellSouth undertook to develop the API. What was  
 (18) the impetus for undertaking that effort when you had  
 (19) the GCI in place?  
 (20) A. CGI.  
 (21) Q. I'm sorry, CGI.  
 (22) A. Yes. We had a number of what we term our  
 (23) mid size CLECs come to us middle to late 1997 and  
 (24) express a desire for an additional interface in  
 (25) addition to the common gateway interface. The impetus

Page 35

(1) for development and what they said they wanted was an  
 (2) API, an application program interface. So in response  
 (3) to their request, we began that development. There are  
 (4) actually three companies, three of our larger  
 (5) resellers, that had that specific desire. So we began  
 (6) that development in response to them.  
 (7) The advantages and disadvantages for the  
 (8) differences - let me focus it that way. The common  
 (9) gateway interface is a method of interfacing with a  
 (10) web-based server that uses the HTML language, hypertext  
 (11) markup language, to allow a machine to send and  
 (12) retrieve information from another machine. It requires  
 (13) that the CLEC's programmer manipulate data that is  
 (14) returned and handle that data in certain ways before  
 (15) they put it in their program. But most of the work of  
 (16) obtaining the data and transporting the data is done on  
 (17) the BellSouth end of the process.  
 (18) The API is a technically different method  
 (19) where the computer code that does a good bit of that  
 (20) work resides in the CLEC's computer. And the method of  
 (21) getting the data and the method of separating the data  
 (22) into its components is hidden from the CLEC.  
 (23) So the advantage is that the CLEC's  
 (24) programmers have, not so much less, but different work  
 (25) to do, and the use of the API makes it look a lot like

Page 48

- (1) Record in anticipation of converting to company?"
- (2) A. Yes, it does say that.
- (3) Q. So if the customer signed this form, how
- (4) can the rate information or any information in the
- (5) customer services record - the customer's own customer
- (6) services record be proprietary?
- (7) A. My understanding is that in the various
- (8) states and subject to obviously this proceeding in
- (9) front of the Authority, there have been a series of
- (10) specific items laid out as to what constitutes the
- (11) customer services record even on receipt of a form such
- (12) as this. And that in all of our states with the
- (13) possible of exception of Georgia, the rates have not
- (14) been included in that list of items. Other than that,
- (15) legally I can't differentiate for you.
- (16) Q. I wouldn't ask you to differentiate
- (17) legally. You've not offered legal testimony, and I
- (18) won't give you the opportunity to do so.
- (19) Your rates are subject to tariffs in
- (20) Tennessee. Is that correct?
- (21) A. Yes. To the best of my knowledge, they
- (22) are.
- (23) Q. Well, then what about your rates would be
- (24) proprietary? I don't mean that in a legal sense. Why
- (25) would that be confidential if they're not public record.

Page 49

- (1) in the tariff?
- (2) A. My understanding is simply that the
- (3) assembly of those rates into a convenient package for
- (4) the CLEC's marketing use is what BellSouth considers
- (5) proprietary marketing information, not the fact that
- (6) the rates exist or what they are.
- (7) Q. So making it convenient for the CLEC is
- (8) what you object to?
- (9) A. Convenient for the CLEC for marketing
- (10) purposes because again - and we're straying outside of
- (11) my specific expertise here. My understanding is that
- (12) the avoided costs that are included in the discount for
- (13) the services we provide the CLECs include marketing
- (14) costs, and that therefore things relating to marketing
- (15) were to be considered of what it costs and not
- (16) provided. The CLEC was responsible for doing their own
- (17) marketing. Like I said, we're treading on the edge of
- (18) my knowledge about that.
- (19) MR. CAMPEN: I now would like to ask
- (20) Ms. Shaffer to pass out another document which,
- (21) Mr. Chairman, we would like to move into evidence both
- (22) 28 and 29, which I failed to do, and this one which I
- (23) believe will be Exhibit 30.
- (24) (Exhibit 30 marked.)
- (25) CHAIRMAN GREER: Any objections to the

Page 50

- (1) letter of authorization, No. 29, being admitted as an
- (2) exhibit?
- (3) MR. ELLENBERG: I don't think the
- (4) witness properly authenticated 29, but I don't object
- (5) to it.
- (6) CHAIRMAN GREER: Are there any
- (7) objections to Exhibit 30?
- (8) MR. ELLENBERG: No.
- (9) BY MR. CAMPEN:
- (10) Q. Do you recognize the form of this document,
- (11) Mr. Stacy?
- (12) A. Yes, I do.
- (13) Q. What is it?
- (14) A. It is a display of - or a series of screen
- (15) prints of a business customer's customer record
- (16) displayed through the LENS browser and printed off as
- (17) screen prints.
- (18) Q. Looking at pages 1, 2 - and I've numbered
- (19) these at the bottom right-hand corner.
- (20) A. Yes, I see that.
- (21) Q. - 1, 2, 4, and 14, these appear to be
- (22) separate screens, do they not? I may have missed one.
- (23) I hope not. I think there are four different displays.
- (24) I'll give you a moment to look at that.
- (25) A. Yes. Those are four different sections of

Page 51

- (1) the record.
- (2) Q. Can you explain what they are, what
- (3) different types of information is elicited or provided
- (4) on each of these screens?
- (5) A. I certainly can generally. The screen on
- (6) page 1 is the customer identification and the listing
- (7) information. The line that's blacked out in the
- (8) customer section would have the listed name with the
- (9) customer on it.
- (10) On page 2, the directory information and
- (11) the billing delivery information for that customer are
- (12) listed.
- (13) On page 4, the beginning - well, a group
- (14) of the equipment called the common equipment for that
- (15) customer is listed.
- (16) Q. What is common equipment?
- (17) A. That is - in these terms, it is a code or
- (18) something like, as is indicated on this customer, a PBX
- (19) service that's being provided where there are
- (20) additional services listed in either a line section or
- (21) a segment section. It's an indication that there's a
- (22) group of common equipment that's used to provide more
- (23) than one set of services.
- (24) Then on page 14 is a listing of the trunk
- (25) service which for this PBX is a listing of the number

Page 52

- (1) of trunks and the features that they have furnished.
- (2) Q. Would you look at page 5.
- (3) A. I'm sorry. I missed that if you said that.
- (4) Q. I didn't mention the number, you're right.
- (5) Look at page 5.
- (6) A. No. 5 is a listing of the individual line
- (7) features and some other features of that PBX.
- (8) Q. From your experience and expertise, can you
- (9) tell us just generally whether this customer record
- (10) indicates that this customer has got a relatively
- (11) sophisticated type of phone service or is this a
- (12) two-line business customer?
- (13) A. This is not a two-line business customer.
- (14) From looking at it in general, he has at least two
- (15) MegaLinks, so he's got at least 48 trunks; and looking
- (16) back on the station pages, a substantial number of
- (17) individual trunks and stations below that. So it's a
- (18) fairly complex PDX service.
- (19) Q. Would you explain what USOC codes are?
- (20) A. USOC codes are - the acronym stands for
- (21) universal service ordering code. And if you will look
- (22) beginning on page 5, the line that is about halfway
- (23) down the page - and I apologize; I can't quite read
- (24) this copy - I believe that says the number 4 followed
- (25) by S5DBD. The S5DBD is the universal service ordering

Page 53

- (1) code which tells you something about the service in
- (2) this case. And there's an English language
- (3) explanation, and then that references you back to a
- (4) very large set of documentation that explains what that
- (5) code means in some detail.
- (6) Q. So it's akin to a product code?
- (7) A. It's akin to a product code. It can be a
- (8) product code or it can modify a product code. In this
- (9) particular case, this actually modifies the product
- (10) code for a function of the trunks called signaling.
- (11) Q. Looking back at page 4, is there a code on
- (12) that page as well, the XLBXX USOC code?
- (13) A. Yes. That is another USOC code.
- (14) Q. So, for this particular customer, that
- (15) appears to be the first USOC code in this CSR. Is that
- (16) correct?
- (17) A. It's certainly the first one on that
- (18) screen. You're not restricted in the way you pull the
- (19) screens up. But that is the first USOC code, yes.
- (20) Q. And then on page 5, we've got what looks
- (21) like four codes listed - four or so. And flipping
- (22) through pages 6, 7, 8, 9, 10, 11, and 12, there are a
- (23) half dozen or more USOC codes on each of those pages?
- (24) A. Subject to me counting it, yes. There are
- (25) a number of those codes on each page.

Page 54

- (1) Q. I haven't counted them, but it looked like  
 (2) six or eight on each page.  
 (3) Then continuing on through the end of the  
 (4) document, I guess through page 15, there are USOC codes  
 (5) on each of those pages?  
 (6) A. Yes, that's correct, other than the blank  
 (7) pages.  
 (8) Q. And isn't it necessary for a CLEC that's  
 (9) converting a customer from Bell's network to the CLEC's  
 (10) network and using the CSR for that purpose to have  
 (11) those USOC codes?  
 (12) A. Yes and no. Let me answer that one both  
 (13) ways. If they were converting the customer as a  
 (14) BellSouth resale customer, yes, they are necessary. If  
 (15) they were converting them as a facilities-based  
 (16) provider such as NEXTLINK, no, they're not necessary at  
 (17) all.  
 (18) Q. With respect to the second example of a  
 (19) facilities-based carrier, isn't it necessary for the  
 (20) CLEC to have those codes to ensure that the CLEC is  
 (21) going to be providing the customer with the equivalent  
 (22) service, the same service that the customer has been  
 (23) getting?  
 (24) A. If NEXTLINK wants to exactly duplicate the  
 (25) service BellSouth is providing today, there are two

Page 55

- (1) ways of doing that. One of those ways is to get and  
 (2) analyze these codes. The other way is to sit down and  
 (3) produce an order with a customer that defines exactly  
 (4) what they want. Either one of those produces the same  
 (5) result.  
 (6) Q. Do you think this particular customer with  
 (7) as sophisticated a service that they're provided is  
 (8) going to be able to recite USOC codes to the CLEC sales  
 (9) rep?  
 (10) A. I'm sorry. I'm missing that. The CLEC  
 (11) sales rep is selling services, not USOC codes, just as  
 (12) the BellSouth sales rep that sold this account  
 (13) originally was selling services.  
 (14) The discussion at the customer level  
 (15) pertains to services and how those services perform.  
 (16) The sales rep's job then is to turn those descriptions  
 (17) that they discuss with the customer into this series of  
 (18) codes. This is BellSouth's series of codes. I assume  
 (19) that NEXTLINK internally probably does not use USOCs,  
 (20) but I'm just guessing at that. I have never seen the  
 (21) inside of their ordering system.  
 (22) But the sales rep has to turn the  
 (23) discussion with the customer into a service description  
 (24) that can then be used by the providing company. This  
 (25) is BellSouth's version.

Page 56

- (1) Q. So you don't see any particular advantage  
 (2) or value to the CLEC in having access to the USOC codes  
 (3) to ensure that they are providing the service that the  
 (4) customer wants?  
 (5) A. No. I didn't say I didn't see any  
 (6) advantage to it. I simply mentioned for a business  
 (7) customer such as this, I would expect this negotiation  
 (8) process - from my experience, I would expect this  
 (9) negotiation process to go on over a period of several  
 (10) days to make sure that BellSouth is selling you this;  
 (11) do you want it to work the same way when NEXTLINK makes  
 (12) a proposal to you. It would be a back and forth. It  
 (13) would involve this document and a great many other  
 (14) documents both from BellSouth and NEXTLINK.  
 (15) MR. CAMPEN: I want to show you  
 (16) another exhibit which, Mr. Chairman, I'll ask be marked  
 (17) as Exhibit 31, I believe.  
 (18) (Exhibit 31 marked.)  
 (19) MR. CAMPEN: Mr. Chairman, I should be  
 (20) through in about 10 minutes.  
 (21) CHAIRMAN GREER: To be sure, we're  
 (22) going to stop at 15 whether you're through or not.  
 (23) BY MR. CAMPEN:  
 (24) Q. Mr. Stacy, do you recognize the form of  
 (25) his document?

Page 57

- (1) A. I recognize the form of this document. I  
 (2) do not recognize this individual document. I've never  
 (3) seen this one before.  
 (4) Q. I understand that. Based on your  
 (5) familiarity with the BellSouth system, could you look  
 (6) at this document and identify the address of the  
 (7) customer? The customer's name should be marked out,  
 (8) but the address should be there.  
 (9) A. The service address for this customer as  
 (10) indicated on the first page is 220 Athens Way,  
 (11) Nashville. It has a suite number and then a ZIP code.  
 (12) Q. Doesn't that address match up with Exhibit  
 (13) 30, the customer services record provided by LENS?  
 (14) A. Yes. It appears to be the image of the  
 (15) same customer services record.  
 (16) Q. Can you tell us what this document is?  
 (17) Again, I know you're not familiar with this particular  
 (18) document, but -  
 (19) A. This document is a printed form of the  
 (20) electronic information that we just went over in the  
 (21) LENS record.  
 (22) Q. And this particular record is the one  
 (23) provided through the vendor services section of  
 (24) BellSouth. Is that not correct?  
 (25) A. I am not certain of that. It could be, but

Page 58

- (1) I have never - I do not know that the vendor service  
 (2) center uses this form number. I'll accept that subject  
 (3) to check. I don't mean to dispute it; I just haven't  
 (4) seen the version they send back.  
 (5) Q. I understand. Would you look at page 11 of  
 (6) the document you have.  
 (7) A. Yes.  
 (8) Q. At the top of the page, do you see the  
 (9) title Local Service Itemization?  
 (10) A. Yes, I do.  
 (11) Q. Is that available with the CSR provided  
 (12) through LENS to CLECs?  
 (13) A. It is not.  
 (14) Q. So then would that suggest to you that this  
 (15) CSR comes from a source other than LENS?  
 (16) A. Yes.  
 (17) Q. What are the differences between this CSR,  
 (18) Exhibit 31, and the CSR provided through LENS?  
 (19) A. In general, there are two differences.  
 (20) This CSR appears to me to have the rates listed on it  
 (21) in the column called Revenue all the way down the line.  
 (22) It includes a summary that is not on the LENS order  
 (23) called Local Service Itemization that we just  
 (24) discussed. I believe those are the only substantive  
 (25) differences.

Page 59

- (1) Q. The summary that you're speaking of is in  
 (2) fact a summary of the USOC codes that appear on almost  
 (3) every page of the LENS-provided CSR. Is that not  
 (4) correct?  
 (5) A. Yes, it is.  
 (6) Q. Look at page 2 of the document. At the top  
 (7) of the page, you'll see Billing Transfers, Billed From,  
 (8) and a number.  
 (9) A. I'm sorry. I don't see that yet.  
 (10) Q. I've got the wrong order. I apologize.  
 (11) Look at page 11 - page 12. You should see those  
 (12) references there.  
 (13) A. Yes, I see those.  
 (14) Q. What are those?  
 (15) A. I do not know. I'm not familiar with that  
 (16) segment of the record.  
 (17) Q. Look at page 10. At the bottom, you see  
 (18) Related Account Information.  
 (19) A. Yes.  
 (20) Q. Do you know what that is?  
 (21) A. No, I don't know.  
 (22) Q. Would you accept subject to check that  
 (23) these are billing transfer numbers which have to do  
 (24) with related services provided to the customer?  
 (25) A. Subject to check, I'll accept that. That