

53. Based on the foregoing, the costs provided by BellSouth and subsequently modified by the LPSC Staff Consultant, Ms. Dismukes, meet the requirements of the Act as well as the vacated requirements of the Commission's Order and provide a valid and appropriate basis for rates.

54. The information contained in this affidavit is true and correct to the best of my knowledge and belief.

D. Daonne Caldwell

D. Daonne Caldwell

Director - Cost Matters

BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 25th
day of August, 1998.

John J. Glass
Notary Public

My commission expires:

Notary Public, Fulton County, GA
My Commission Expires Sept. 10, 2000

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Application by BellSouth Corporation,
BellSouth Telecommunications, Inc., and
BellSouth Long Distance, Inc. for Provision
of In-Region, InterLATA
Services in Louisiana

CC Docket No. 98-121

AFFIDAVIT OF GUY L. COCHRAN, being duly sworn, deposes and says:

1. My name is Guy L. Cochran. I filed an affidavit as part of BellSouth's original filing in this docket before the Commission, principally addressing BellSouth Telecommunications Inc.'s (BST) compliance with the requirements of Section 272. The purpose of my affidavit is to reply to comments filed related to my original affidavit.
2. In an attempt to create an additional barrier to long distance competition, the interexchange carriers have once again resorted to false allegations regarding BellSouth's compliance with Section 272 requirements. These comments have no substance. BellSouth has set up all internal controls necessary to be in place the day we receive Section 271 approval (and thereby can have an operational 272 affiliate).

**I. BELLSOUTH HAS ELECTED TO DISCLOSE ALL TRANSACTIONS
ALTHOUGH BELLSOUTH HAS NO SECTION 272 SUBSIDIARY AT
THIS TIME**

3. AT&T and MCI claim that BellSouth has not complied with the public disclosure requirements of Section 272(b)(5). BellSouth could not possibly have violated these public disclosure requirements, as BellSouth currently

does not provide services to which Section 272 applies. See Section 272(a)(2). To show its future compliance, however, BellSouth has provided written disclosure of all transactions (including all past transactions) between BST and BellSouth Long Distance (BSLD).

4. This written disclosure provides information on compliance with the rules that applied at the time the transactions took place, namely the Commission's Affiliate Transaction Rules (the Rules). For example, transactions performed during 1996 were recorded on BST's books on the fully distributed cost ("FDC") basis as required by the Rules. Transactions performed after August 1997 were recorded on BST's books according to CC Docket 96-150. These are the only Rules which apply to those transactions.
5. AT&T and MCI ignore the implications of their argument that the Section 272 requirements are applicable. If these requirements were currently applicable, BST would be able to rely upon the exception for activities covered by Section 272, set out in the revised Affiliate Transaction Rules released in CC Docket No. 96-150, for its transactions with BSLD. The more burdensome aspects of the revised Affiliate Transactions Rules, which BellSouth has applied to these transactions, would not be applicable. In particular, the FDC of each transaction would be irrelevant as would be the estimated fair market value required to be documented under the standard affiliate transaction rules mandated in CC Docket 96-150. See 47 C.F.R. paragraph 32.27(d). AT&T and MCI cannot argue that Section 272 currently applies to BST/BSLD transactions unless they concede that BST has operated under stricter rules than would govern under their theory.
6. BST's written disclosure also describes those services which BST will provide to BSLD and to requesting nonaffiliates on a nondiscriminatory basis when BellSouth receives 271 approval. My original affidavit, at paragraph 28 (App. A, Tab 4), clearly states that these services will be "nondiscriminatory." If such services are provided to BSLD, nonaffiliates will also be able to receive these services from BST under contract with the same terms, conditions, and

rates as BSLD. Once terms and conditions are final, contracts between BST and BSLD are available for review at BST's Atlanta Headquarters and posted by BSLD on the Internet.

7. AT&T and MCI also express concern over the fact that BellSouth contends that it is not required to comply with the disclosure obligations of Section 272(b)(5) prior to receiving Section 271 authorization. This is a legal dispute without any practical significance. Despite its understanding of Section 271, BellSouth fully complies with the disclosure obligations of Section 272(b)(5) by providing written disclosure of all transactions between BST and BSLD as noted above in paragraph 2.
8. AT&T contends that the disclosure of BSLD's current transactions fails to satisfy Section 272(b)(5) because it is not sufficiently detailed. However, transactions for services which will be provided to BSLD upon BellSouth's receipt of Section 271 approval have been reduced to writing and the entirety of the prices, terms, and conditions of BSLD contracts with BST are set forth at BSLD's Internet address. Also, a complete copy of each of the contracts is attached as Exhibit 4 of the Wentworth affidavit of the original filing in this docket (App. A, Tab 26). A distinction should be made between disclosing contracts covering services to be provided to a 272 affiliate upon receipt of 271 approval, versus past transactions which are covered only by the FCC's Affiliate Transactions Rules. The contracts for services to be provided to a 272 affiliate upon 271 approval are the transactions that are required to be disclosed.
9. AT&T argues that BST/BSLD agreements posted on the Internet differ in significant respects from similar agreements made available for public review by BST at its place of business. The only difference is that the disclosure of past transactions available for public review at BST's Atlanta Headquarters contain an explanation of the FCC's guidance as to the computation of fully distributed cost (FDC). It is not necessary to provide a tutorial on the FCC's rules on BSLD's Internet site in order to provide disclosure of transactions.

10. AT&T states that BST and BSLD have been unwilling to post detailed written descriptions of their transactions on the Internet within 10 days of the transaction. This is not true. All current transactions are being posted to the Internet within 10 days of the transaction (and all past transactions have been disclosed as well). In fact, as BellSouth currently has no 272 affiliate, NO transaction disclosure is required. However, in order to show good faith and to show that these procedures are in place, BSLD is posting transactions. All transactions have been posted from the date of BSLD's decision to make the premature disclosures.
11. AT&T argues that BellSouth and BSLD failed to provide any information in this application concerning transactions between nonregulated affiliates and BSLD, as required by paragraph 373 of the Ameritech Michigan Order. This Order states that if a Bell Operating Company (BOC) transfers to an affiliated entity ownership of any network elements that must be provided on an unbundled basis pursuant to Section 251(c)(3), such entity will be deemed to be an assign of the BOC and subject to the Section 272 requirements in the same manner as the BOC. AT&T therefore claims that BellSouth failed to demonstrate that no transaction was subject to the disclosure and nondiscrimination obligations of Section 272. Actually, paragraph 11 of my original affidavit clearly states that BST has not transferred to any affiliate any network facilities that are required to be unbundled pursuant to 251(c)(3). It further states that BST has not transferred facilities to any affiliate that would make that affiliate a successor or assign of BST under Section 251(h)(1)(B)(ii).

II. BST and BSLD Maintain Separate Officers, Directors, and Employees

12. AT&T contends that BellSouth and BSLD fail to meet their burden of establishing that they have separate officers, directors, and employees within the meaning of Section 272(b)(3). Paragraph 12 of the Wentworth affidavit specifically stated that no officer, director, or employee of BSLD is currently,

or will be, simultaneously an officer, director, or employee of BST. Exhibit 3 of the same affidavit listed BSLD's officers. Paragraph 18 of my original affidavit listed all of the members of BST's Board of Directors and stated that none of these persons is an officer or director of BSLD. It further stated that for as long as Section 272(b)(3) applies, no member of BST's Board of Directors will be an officer or director of BSLD while simultaneously serving as an officer or director of BST.

13. AT&T looks to paragraphs 353-362 of the Ameritech Michigan Order for support of its theories regarding separate officers, directors, and employees. In a very obscure manner, Sprint also cites this Order to suggest that BellSouth and BSLD do not comply with Section 272(b)(3) because BSLD has only one director. In the Ameritech Michigan Order, the FCC ruled that Ameritech's application was not in accordance with Section 272(b)(3) because, in effect, Ameritech's interLATA affiliate (ACI) did not maintain separate directors from the operating company (Ameritech Michigan). AT&T has misrepresented the facts in this case. ACI was a Delaware close corporation and Ameritech Michigan was a Michigan close corporation. Ameritech Corporation owned 100% of the stock of both of these corporations, and the certificates of incorporation of both companies did not provide for boards of directors. Therefore, the FCC had to look to Delaware and Michigan corporate law to determine whether ACI had separate directors from Ameritech Michigan. The relevant state corporate law of Delaware and Michigan assign the responsibilities and liabilities of directors to shareholders under the form of organization that Ameritech chose for ACI and Ameritech Michigan when no board of directors has been established. The FCC therefore concluded that Ameritech Corporation was the director of both ACI and Ameritech Michigan. The FCC finally ruled that because Ameritech Corporation was the director of both ACI and Ameritech Michigan, ACI did not satisfy the requirement of Section 272(b)(3) that it have separate directors from the BOC of which it was an affiliate.

14. The facts in the case of BST and BSLD are completely different from the facts in Ameritech's case. Both BST and BSLD established Boards of Directors, and state corporate law therefore is not relevant to confirming that BSLD has separate directors from BST.
15. AT&T asserts that Section 272(b)(3) is breached where officers of the BOC and its Section 272 affiliate ultimately report to the same director of the parent corporation. However, in paragraph 361 of the Ameritech Michigan Order, the FCC recognized that corporations are ultimately responsible to their shareholders and that complete independence of management of the subsidiary will not always be possible. The FCC further stated that Congress required that the BOC and the interLATA affiliate be separately managed to at least some degree, and one of the affirmative requirements is the separate director requirement. BSLD and BST have shown that they are separately managed to a large degree (among other things) by the establishment of separate Boards of Directors, as well as separate officers and employees. Therefore, BSLD and BST are in compliance with the requirements of Section 272(b)(3). It is wholly unclear why Sprint believes that BSLD's having only one director is the equivalent of BSLD and BST having the same director.

III. FURTHER INFORMATION ON SPECIFIC TRANSACTIONS

16. MCI expresses concern over the possibility of BSLD being allowed to use BST's internal corporate network. BST does not provide and, at this time, has no plans to provide any services to BSLD over BST's corporate network.
17. MCI suggests that BST has improperly granted BSLD collocation rights. MCI seems to believe that because BSLD has no in-region interLATA authority and its equipment is not yet operational, BST should not grant BSLD collocation rights. MCI is wrong. First, BST does not require that carriers (affiliated or unaffiliated) be operational at the time they obtain collocation space. The procedure used to grant BSLD collocation rights is no different from the procedure that is used to grant any other carrier such rights.

BSLD has signed BST's standard Collocation Agreement. Moreover, BSLD does not have discriminatory access to information about collocation space (all carriers have equal access to this information). In fact, at least 25 other collocators have collocated in one or more of BST's central offices throughout the region under the same collocation guidelines under which BSLD operates. Contrary to MCI's unsupported speculation, BSLD and BST are not cooperating to preempt unaffiliated carriers that have a need for collocation space. Furthermore, BST has shown no preferential treatment to BSLD with regard to the amount of space it receives, prices charged, or installation intervals. MCI or any requesting telecommunications carrier may request and receive physical collocation arrangements pursuant to all the rates, terms and conditions contained in the BSLD agreement.

18. MCI asserts that BST has allowed BSLD to use the "BellSouth" brand name without compensation to BST. MCI makes a false assumption as to the ownership of the "BellSouth" brand name. The "BellSouth" brand name belongs to BellSouth Corporation, which allows its corporate family members to use the brand name. Thus, there is no agreement to be made between BST and BSLD concerning the "BellSouth" brand name. Furthermore, as MCI admits in a footnote, the Commission has already decided that BSLD does not have to compensate BST for the use of the Corporation's brand name. MCI at 70 n.56.
19. MCI asserts that it is unable to conclude whether "competitively sensitive information about BST services" was transferred to BSLD in the form of personal knowledge held by employees who were transferred from BST to BSLD. The Telecommunication Act of 1996 requires separate officers, directors, and employees. It does not prohibit the transfer of employees within BellSouth Corporation. There is nothing in the Act that prevents a BSLD employee from applying his or her knowledge and experience to work done for BSLD. Nevertheless, all BellSouth employees are required to sign personal responsibility commitments which include statements instructing

employees not to misuse information gained while they are employed by BST or any other BellSouth entity. Specifically, the Personal Responsibility Handbook states: "Proprietary information about customers, suppliers or partners shouldn't be used for inappropriate purposes by the BellSouth company that received the information. Nor should the information be inappropriately provided to other companies."

20. MCI expresses concern that BST might discriminate between its 272 affiliate and unaffiliated IXCs with respect to the introduction of new services. MCI's purported fears are unfounded. Paragraph 28 of my original affidavit states that BST will provide BSLD with nondiscriminatory services under contract. These services will be available to nonaffiliates under the same contract terms as those available to BSLD. The contracts that have been executed already are reproduced on BSLD's Internet homepage and any company can request the same services.
21. AT&T asserts that BellSouth and BSLD are not in compliance with Section 272 because they have not made a commitment to provide BSLD and other entities, on identical terms and conditions, with equal access to customer proprietary network information ("CPNI"). However, in the same comment, AT&T admits that, in paragraph 169 of the CPNI Order, the FCC ruled that Section 272 imposes no additional CPNI requirements on BOCs' sharing of CPNI with their Section 272 affiliates. Therefore, BST is not required to commit to providing BSLD and other entities, on identical terms and conditions, equal access to its CPNI.
22. AT&T states that BellSouth intends to instruct its marketing representatives to recommend BSLD long distance service at the outset of inbound calls for new service, and to read a random list of other available IXCs only if requested to do so by the caller. AT&T contends that this practice is unlawful under Sections 251(g) and 272(g). However, in the same comment, AT&T admits that in the South Carolina Order, the FCC ruled that such practice is lawful. As the Commission held, this qualified form of joint marketing balances

marketing rights and equal access requirements, giving effect to both.

Permitting BellSouth's approach, moreover, gives effect to the joint marketing authority of Section 272(g).

23. AT&T notes that BST intends to assist BSLD in the development and creation of packages of local and long distance services offered on an integrated basis and claims that these services constitute planning, design, and development of services that must be made available on the same terms to other IXCs. In paragraph 296 of the Non-Accounting Safeguards Order, however, the FCC stated that determinations regarding the classification of services are fact-specific and will need to be made on a case-by-case basis. The services that BST intends to provide are in fact joint marketing activities. Therefore, BST can offer these services to BSLD without offering to other IXCs on the same terms.

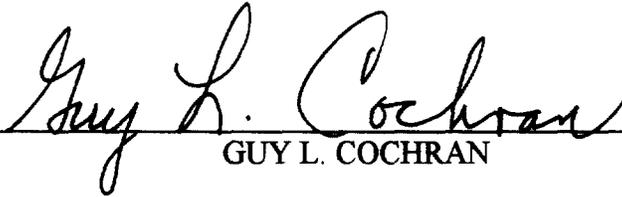
IV. BELLSOUTH HAS CONTROLS IN PLACE

24. AT&T's claim that BellSouth has no controls in place for Section 272 compliance is incorrect. Both my affidavit and Lynn Wentworth's affidavit disclose that BSLD has been organized from its outset to facilitate compliance with Section 272 rules. Both affidavits discuss how BellSouth will comply with Section 272(b)(1)-(b)(5). Specifically, BST and BSLD have (1) separate employees, officers, and directors; (2) no joint ownership of switching or transmission equipment; (3) separate books of accounts; (4) accounting rules under which each entity's books are maintained; and (5) the annual reporting mechanisms and audits to which those reports are subject. These steps to ensure compliance with Section 272 and the Commission's implementing regulations are in addition to well-established procedures used by BST to ensure compliance with analogous regulatory requirements. These procedures, contrary to allegations by AT&T (McFarland, paragraph 55), are comprehensive and entirely sufficient. See paragraphs 7 - 35 of my original affidavit.

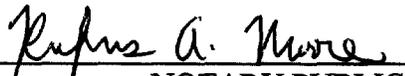
25. My affidavit emphasizes that transactions between BSLD and BST are recorded by BST in accordance with the applicable Parts 64.902 and 32.27 Rules. Accordingly, as with all new nonregulated services or affiliate transactions, subject matter experts from legal, regulatory, and accounting participate on the product or transaction teams to educate those teams on all applicable rules and laws.

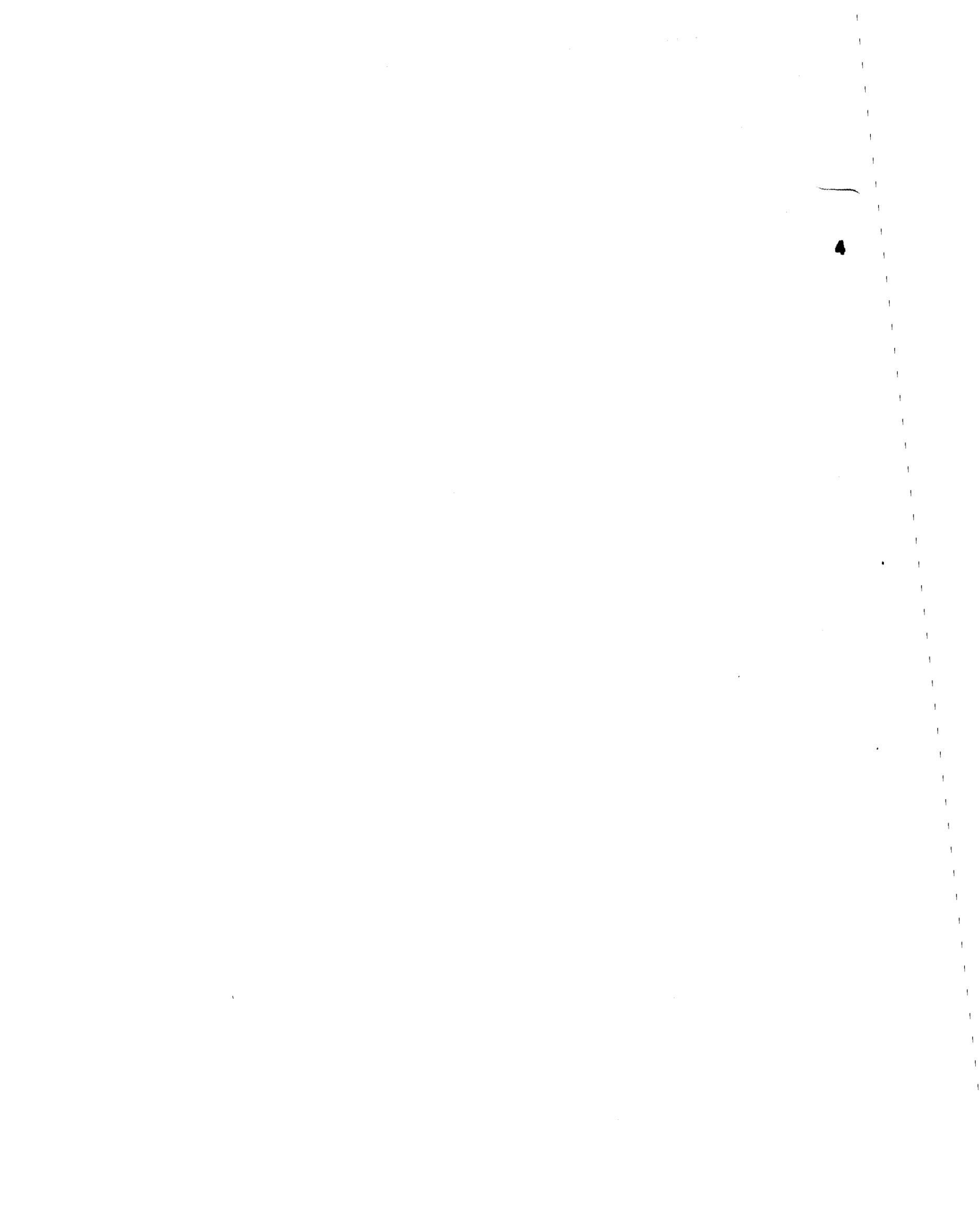
26. This concludes my affidavit.

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


GUY L. COCHRAN

Subscribed and sworn before me on this 25TH day of August, 1998


NOTARY PUBLIC



BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

In the Matter of Application by BellSouth Corporation for Provision of In-Region, InterLATA Services in Louisiana.

CC Docket No. 98-121

**REPLY DECLARATION OF
WILLIAM C. DENK**

1. I am a Vice President at M/A/R/C Research, One Premier Plaza, 5605 Glenridge Drive, Suite 760, Atlanta, GA 30342. I have previously filed a declaration in the above-captioned matter. This reply has been prepared in response to comments filed by The Association for Local Telecommunications Services (ALTS), KMC Telecom, the Competition Policy Institute (CPI), and Sprint, and by Professors Hubbard and Lehr on behalf of AT&T, all relating to my earlier submission.
2. ALTS notes that the research study described in my prior affidavit and report did not include interviews with persons who had either not considered taking PCS service, or had considered PCS and decided not to subscribe to it. Likewise, Professors Hubbard and Lehr contend that "because the sample was drawn from PCS users, it is likely to be biased and not representative of the average residential subscriber." As indicated on page 1 of the report, the primary objective of the research was to examine the market in Louisiana for the existence of customers who exhibit patterns of PCS purchase and usage which indicate they are substituting PCS for local wireline service. The existence of PCS customers meeting these criteria constitutes factual evidence that substitution is

occurring. Including non-PCS customers in the sample plan would have added no value in meeting the study objective of identifying whether substitution of PCS for local wireline service is occurring.

3. KMC Telecom and CPI contend that the study is invalid because the sample used was not a random probability sample, but self-selecting. There are two general types of sampling methods in research – probability and nonprobability methods. Probability methods are those in which sample units or members are chosen at random from the population of interest. In probability sampling, every unit or member of the population has a non-zero chance of being included in the sample. Probability sampling features the ability to measure sampling error and assign a sampling error estimate to a survey result.

4. While theoretically ideal, in a practical business context, probability samples are used infrequently. Rarely is the population of interest readily identified and observed. Therefore, sampling from it in a random fashion is often either impossible or impractical.

5. Many research studies contemplated by corporations face these and other types of design constraints, in addition to cost and timing constraints. For these reasons, nonprobability methods are frequently used in business, more so than probability methods. Corporations base important decisions on research using nonprobability samples every day.

6. Nonprobability methods feature the purposeful but non-random selection of sample units or members. From a pure theoretical perspective, they do not allow the measurement of sampling error. However, as Paul Green and Donald Tull point out in their classic text Research For Marketing Decisions, “one should not conclude that probability sampling always yields results that are superior to nonprobability sampling, nor that nonprobability sampling methods are necessarily ‘less representative’ of the population under study.”

7. CPI suggests a probability sample could have been attempted by use of a random digit generator to select random PCS phone numbers. We actively considered this option in the planning phase of the study. However, after careful review, this option was ruled out. Because large numbers of PCS subscribers keep their PCS phones turned off to avoid receiving calls, these PCS users would have had zero chance to be included in a randomly generated sample of PCS phone numbers. Besides this factor, this sampling approach likely would have created a bias towards finding substitutors. As some customers substituting PCS for local wireline service maintain no wireline phone, they are more likely to keep their PCS phone turned on all the time to receive calls. Therefore, we would have been more likely to reach these users than other PCS users if we had called PCS phone numbers randomly generated from PCS prefixes.

8. A second and perhaps more vexing problem with CPI's proposed methodology is that PCS customers typically have to pay for incoming calls on their PCS phone. We suspected that a high percentage of PCS users, even if they had their phones turned on, would be unwilling to pay for our phone call, and therefore would not have a chance to be included in the sample. Even if we offered to pay for airtime in our introduction, we suspected that a high percentage would not listen long enough to hear the offer.

9. After determining that drawing a random probability sample was not feasible for the Louisiana study, we sought a sampling alternative that would maximize the representativeness of a sample of PCS users, while at the same time recognizing cost and timing considerations. The sampling alternative selected to qualify study participants in the New Orleans metro area – placing ads in the largest daily newspaper (The Times Picayune) and the largest weekly entertainment publication (The Gambit) in different sections on different days – allowed us to reach the broadest possible cross-section of PCS users and potential study participants in a reasonable timeframe at a reasonable cost. This

sampling method is commonly used to recruit a sample group within a specific geography that has a low representation in the population (like PCS users). We felt this method would result in a large number of PCS users having a chance to participate in the study, resulting in a relatively large sample size. In addition, this sampling method addressed the shortcomings of the method suggested by CPI – it enabled us to include PCS users who do not keep their PCS phones on at all times, as well as PCS users who would have been unwilling to pay for an incoming call by a survey firm.

10. The fact that a nonprobability sample was used certainly does not make our sample or the study invalid. From a theoretical perspective, use of a nonprobability sample limits the ability to measure sampling error. However, it does not limit the ability to say, as the report did, that 16% of the respondents interviewed substitute PCS for local wireline service in some way. And, the fact that the 16% substitution result is so similar to the 17% result produced from the independently selected sample in first Louisiana study M/A/R/C conducted is a very strong indication of the reliability of the result.

11. In addition, the method of recruiting PCS users was not biased towards substitutors. There is not any obvious reason for or evidence of correlation between responding to an ad in the newspaper and substituting PCS for wireline service. Substitutors of PCS for wireline service are no more likely to respond to the ad than non-substitutors.

12. With respect to self-selection, all survey research is self-selecting. When one is offered or exposed to the opportunity to participate in a survey, regardless of method, one makes a decision whether or not to participate, which can be considered self-selection. In this way, all research studies tend to be conducted among cooperators, but this fact does not cause the users of research studies to consider them invalid.

13. Offering a cash incentive (as we did in this study) is one way of motivating those who may typically be "non-cooperators" to participate. Many potential respondents have a wholly reasonable attitude about marketing research studies that companies use the opinions they provide to make money. These people feel they should be paid for the time they spend answering questions. Rather than being biased toward one result or another, they are more cooperative because they feel the company is sharing some of the profit it makes using their opinions.

14. CPI also comments that the sample size of the survey (N=202) is too small to be useful. It is important to note that analyzing sample groups of approximately 200 respondents or fewer and drawing conclusions is very common in marketing studies used by corporations and others to help make important business decisions. And as noted earlier, the consistency of the findings between the first and second Louisiana studies (17% were substitutors in the first study, 16% in the second study) provides further empirical evidence of the reliability of these sampling estimates. Importantly, moreover, having a larger sample size could not have changed the primary conclusion from this study that there are PCS users in the New Orleans metro area -- including members of the 202 person sample -- who substitute PCS for local wireline service.

15. Sprint makes the general assertion that survey questions were poorly worded and ambiguous, and cites the response option "Subscribed to PCS for initial service instead of wireline" as an example. Sprint misrepresents the actual response option. The actual response option in the questionnaire was worded as follows - "I was getting phone service for the first time for my residence (or work) and decided to use mobile service instead of wireline service." Sprint tries to suggest that this response reveals people who, when first coming to town or to a new address, call a PCS company before they call the phone company to subscribe to wireline service. However the words "decided to use mobile service instead of wireline service" are quite clear! The person

who selects this option did not get wireline service. Moreover, if the question and this response option were truly ambiguous, this might have resulted in a high percentage of "don't know" answers to the question, which was not observed.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 24, 1998.

A handwritten signature in black ink, appearing to read "W.C. Denk", written over a horizontal line.

William C. Denk

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Application by BellSouth Corporations,)
BellSouth Telecommunications, Inc.)
and BellSouth Long Distance, Inc. for)
Provision of In-Region, InterLATA)
Services in Louisiana)

CC Docket No. 98-121

AFFIDAVIT OF JAN FUNDERBURG

**FILED AUGUST 28, 1998
(REPLY)**

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**AFFIDAVIT OF JAN FUNDERBURG
FILED AUGUST 28, 1998**

Jan Funderburg, being duly sworn, deposes and says:

1. My name is Jan Funderburg. I am employed by BellSouth Telecommunications, Inc. (BellSouth). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Operations Vice President - Customer Services in the Interconnection Services department of BellSouth. In this position I am responsible for the development of procedures used by BellSouth personnel to serve Competitive Local Exchange Carriers (CLECs) and for operations of the centers that support CLEC pre-ordering, ordering, provisioning, maintenance, billing and collections. I have previously held positions in BellSouth Operator Services, Sales and Marketing, Network Operations, Human Resources, Consumer Services, and Small Business Services. I previously submitted an affidavit in support of BellSouth's application in this docket.