

I. **PURPOSE OF THE AFFIDAVIT**

2. I now provide this affidavit in response to the comments and affidavits regarding the ordering, provisioning, and maintenance associated with Competitive Local Exchange Carriers (CLECs).

II. **GENERAL**

OPERATIONS CENTERS AND WORK GROUPS

3. TRA questioned the quality of personnel assigned to BellSouth's ordering and repair centers utilized by CLECs (TRA at 25, 28).
4. The personnel in BellSouth's Local Carrier Service Centers (LCSCs), BellSouth Resale Maintenance Center (BRMC), and Unbundled Network Element Centers (UNECs) are trained, qualified employees capable of providing a high level of service to CLECs in a professional manner (Funderburg Affidavit, App. A, Tab 7, ¶¶ 5, 7, 8, 14). BellSouth has streamlined and enhanced the training of our LCSC employees and has designed customized training paths for use in the local operations centers. Further, BellSouth has employed outside management consultants to assist in connection with newly trained employees in the CLEC ordering and repair centers.
5. BellSouth's LCSCs were granted ISO 9002 certification in 1998, demonstrating the LCSC's compliance with high standards of quality recognized throughout the world. This certification requires employees in the LCSCs to meet training standards, thus qualifying them to perform functions necessary for accurate processing of CLEC orders. The LCSCs and the Interexchange Carrier Service Centers (ICSCs) are the only ordering centers in BellSouth that have achieved this registration.

6. While BellSouth employs a highly skilled and trained workforce, we find that many of the CLECs are staffed with less skilled, sometimes minimum wage/part-time employees and thus experience high turn-over rates. These factors contribute to the magnitude of the problems experienced by the CLECs.
7. Intermedia noted that an independent consultant found that the LCSC had a need for process improvements and that the problems may not have been corrected (Intermedia at 12).
8. Intermedia's assessment of the LCSC is outdated and not relevant to the existing operation, however, during the first quarter of 1997, BellSouth engaged DeWolff, Boberg & Associates (DB&A), a consulting firm specializing in performance improvement, to assist with the efficient start-up of the LCSCs. After twenty-two weeks of development, DB&A stated in a letter dated September 15, 1997, that "the centers are operational and ready to handle your customers' requests for service." Further evidence of BellSouth's operational capabilities was demonstrated by ISO 9002 certification of the LCSCs in July 1998.

ORDERING

9. KMC complained of unnecessary delays in calling card conversions (KMC at 21-22; Pipes Affidavit [KMC] ¶ 12).
10. BellSouth processes allow a CLEC to provide a calling card Personal Identification Number (PIN) on the submitted LSR. This enables the end-user to continue using his/her existing calling card until the new card is received. The reason for the delays cited by KMC is that KMC has failed to submit LSRs accurately.
11. KMC indicated that BellSouth has no procedures in place for resale orders for its FlexServ® service, resulting in processing delays (KMC at 17; Pipes Affidavit [KMC] ¶ 10).

12. BellSouth does have a process in place for ordering FlexServ® service. FlexServ® is a complex service that requires the engineering of a design network and utilizes complex ordering procedures. Installation of FlexServ® involves coordination of multiple network infrastructure centers for complete service provisioning which is reflected in the installation interval. The ordering interval for Resale FlexServ® service is the same as that of FlexServ® retail service. The specified interval for FlexServ® service is published on the Interconnection website (www.interconnection.bellsouth.com/guide/guides.html). BellSouth provides Account Team support for the service inquiry and systems design processes for all complex services.
13. Further, BellSouth provided on-site assistance to KMC at its Savannah, Georgia, location on February 26-27, 1998, to help the CLEC understand BellSouth's operational processes. At KMC's request, BellSouth is scheduled to provide that same on-site support at the Greensboro, North Carolina, location on September 16-17, 1998.
14. MCI complained that the use of account teams to process complex CLEC orders does not provide parity because it requires too much manual involvement by BellSouth (MCI at 52).
15. As the term "complex" implies, these orders require special handling by the BellSouth Account Teams to ensure the availability of equipment and facilities to provide the requested CLEC service. The service inquiry process, initiated by the Account Team to internal organizations, is often necessary to properly evaluate the requested service and to provide the CLEC with an appropriate and valid service commitment. BellSouth's complex ordering processes for CLECs are the same manual ordering processes used for BellSouth complex retail customers (Funderburg Affidavit ¶¶ 52-62).
16. AT&T complained about the procedures for ordering "partial migrations" (Hassebrock Affidavit [AT&T] ¶¶ 39).

17. BellSouth can electronically administer "original" partial migration service requests via EDI, using the BellSouth telephone number in the LOCBAN field of the LSR (Stacy Affidavit, App. A, Tab 22, ¶ 33). Subsequent partial migrations are processed manually by the LCSC and will not be mechanized via EDI until national standards, established by the Telecommunications Industry Forum (TCIF) are approved and implemented. TCIF releases are coordinated by the Ordering and Billing Forum (OBF), which currently has the matter under review.
18. KMC alleged that BellSouth delays clarification for incorrect Yellow Page heading codes on "as is" orders. (KMC at 16; Pipes Affidavit [KMC] ¶ 6).
19. BellSouth system edits will process "as is" orders with correct Yellow Page code information. The LCSC will clarify orders which fail these system edits by advising CLECs to contact their end-user to obtain the necessary headings information. The same process applies in a BellSouth retail environment, where the Service Representative negotiates Yellow Page headings information directly with the end user.
20. Several CLECs complained that the 24-hour firm order confirmations (FOCs) are not received in a timely manner (KMC at 11-12; Davis Affidavit [KMC] ¶¶ 3-4; Pipes Affidavit [KMC] ¶¶ 5, 13; Pfau/Dailey Affidavit [AT&T] ¶ 69; AT&T at 33; Bradbury Affidavit [AT&T] ¶¶ 252-254; CompTel at 6; MCI at 42, 47; Green Affidavit [MCI] ¶¶ 75, 149-157; Rozycki Affidavit (ALTS/ITC DeltaCom) ¶ 14; Closz Affidavit [Sprint] ¶¶ 56-58 & Exhibit MCL-1).
21. The FOC intervals may vary by service type; however, 48 hour intervals are the most common and are generally BellSouth's target for FOC intervals (Interval Guide, App. A, Stacy OSS affidavit, Exhibit 18). Inaccurate or incomplete LSRs from the CLECs require clarification and inhibit BellSouth's ability to meet FOC intervals. On the average, 14.6% of the LSRs received by the LCSCs during the first seven months of 1998 required clarification.

22. DeltaCom complained that BellSouth frequently fails to provide FOC within 48 hours of LSR submittal (Rozycki Affidavit, CompTel/ITC Deltacom ¶ 8; Sprint at 36; Closz Affidavit [Sprint]; ¶ 58 & Exhibit MCL-1; CompTel at 7, 9).
23. As previously stated, inaccurate or incomplete LSRs from CLECs require clarification and inhibit BellSouth's ability to meet FOC intervals. Of the LSRs submitted by ITC DeltaCom during the first seven months of 1998, 21.9% required clarification.
24. Intermedia complained of major problems with BellSouth's order processes for LSR receipt and handling (Intermedia at 12).
25. BellSouth has taken a variety of successful steps to ensure that the problems suggested by Intermedia do not occur, as my initial affidavit explained. Orders are input into LON to allow tracking of CLEC LSRs. FOC responses have been mechanized to improve efficiency and to eliminate manual handling errors on FOC responses. In addition, a daily LSR Receipt report is transmitted to the CLEC to ensure accurate handling of LSRs. BellSouth is not aware of any current issues associated with the handling of Intermedia LSRs.
26. AT&T contended that BellSouth depends on manual intervention to notify CLECs of jeopardies that inhibit BellSouth's ability to meet due dates (AT&T at 4; Green Affidavit [MCI] ¶ 116).
27. AT&T's contention that all jeopardy conditions depend on manual intervention for CLEC notification is incorrect. AT&T utilizes EDI to electronically transmit LSRs to BellSouth. EDI electronically notifies AT&T of subscriber-caused and subscriber-related due date jeopardy conditions. The EDI 855 and 865 transaction sets enable the CLEC to set new due dates for service provisioning with the end user. Notification for BellSouth-caused due date jeopardy conditions is provided by the BellSouth employee responsible for the jeopardy or by the appropriate departmental contact, as my prior affidavit indicated.

28. WorldCom complained that they have encountered problems with complex order error rejections (WorldCom at 18; Coburn Affidavit ¶¶ 3-6).
29. Complex order rejections are directly related to the accuracy and completeness of information provided by the CLEC. A group of highly skilled BellSouth employees is trained specifically in the area of complex service ordering, qualifying them to handle CLEC requests effectively and efficiently. The CLEC must assume responsibility for obtaining comparable expertise in the area of complex services. Lack of accurate CLEC input causes clarifications and prolongs the ordering process.
30. AT&T complained that BellSouth fails to provide timely notification of errors and rejections (Bradbury Affidavit [AT&T] ¶¶ 13, 21).
31. BellSouth disagrees with AT&T's complaint, as the EDI notification process is mechanized. Errors detected in the mechanized edit process, i. e., rejects, are returned automatically and mechanically through EDI within minutes after processing by the Local Exchange Ordering (LEO) system. All other errors are returned through the EDI mechanized process after review. The mechanized process, which is further described in the OSS affidavits of Mr. William Stacy, provides timely notification.
32. KMC complained of BellSouth's issuing multiple clarifications on individual orders, causing delays in provisioning (KMC at 17; Pipes Affidavit [KMC] ¶ 9; Davis Affidavit [KMC] ¶ 5; see generally TRA at 26-27). Further, KMC complained that the manual service order process is delayed because of BellSouth's repeated requests for clarification. KMC alleged that more than 50% of the clarifications are required because of errors in BellSouth records or from mistakes by BellSouth's Service Representatives (KMC at 16; Pipes Affidavit [KMC] ¶¶ 5-6).
33. The requirement for clarification is avoided when CLECs provide complete and accurate LSRs. BellSouth also disagrees that the percentage quoted by KMC is a result of BellSouth errors. On the average, 23.2% of the LSRs submitted by KMC during the first

seven months of 1998 required clarification; this is well above the composite CLEC average of 14.6% for the same period.

34. BellSouth Service Representatives in the LCSC are trained to review the entire LSR for errors before placing the LSR in clarification. Multiple clarifications on the same LSR may result from errors on supplemental LSRs submitted by the CLEC or from rejections generated by downstream system for errors not identifiable by the Service Representatives. LSRs from KMC that require clarification are clarified an average of 1.23 times.
35. KMC complained about BellSouth's clarification process for intrastate local primary exchange carrier (LPIC) coding (KMC at 16-17; Pipes Affidavit [KMC] ¶ 7).
36. BellSouth understands the intrastate and interstate requirements for PIC and LPIC designations. When PICs and LPICs are not properly designated by the CLEC, requests for clarification will be returned by BellSouth. However, KMC has submitted LSRs with LPIC designations for services in states that do not have LPICs; additionally, KMC has submitted LSRs without LPIC designations for services in states in which they are required. In both scenarios, clarification has been necessary.
37. OmniCall complained that BellSouth representatives advise customers that they will lose their BellSouth Yellow Page advertisements if they change local service providers (OmniCall at 4).
38. BellSouth has trained its retail representatives not to mislead potential CLEC customers or disparage competitors in the course of business interfaces with any customer.
39. State Communications claimed that BellSouth refused to provide assistance with an order a CLEC was submitting (State Communications at 3; Russell Affidavit [(State) ¶ 4).
40. CLEC Account Teams, designated Customer Support Managers, and LCSC management personnel are available to the CLECs to discuss issues needing clarification or escalation,

as I discussed in my initial affidavit. Further, BellSouth provided on-site assistance to State Communications on May 12-13, 1998, to help the CLEC understand BellSouth's operational processes.

PROVISIONING

41. E.spire complained that BellSouth's technicians and the UNE provisioning center are not available to address cutover problems after 6:00 PM (e.spire at 25).
42. BellSouth is available for provisioning activities outside the normal operating hours upon scheduled requests. E.spire should include after-hour requests on LSRs submitted to the LCSC. The provisioning activity will be scheduled and coordinated by the BellSouth UNEC and is subject to overtime charges. This process is addressed in the Funderburg affidavit, Paragraphs 98-107.

DIRECTORY LISTINGS

43. AT&T claimed that BellSouth does not have processes in place to accept orders for complex directory listings, AT&T-assigned numbers, and subsequent partial migrations (Hassebrock Affidavit [AT&T] ¶¶ 59-60).
44. BellSouth has manual processes in place to accept orders for complex directory listings, assigned numbers, and subsequent partial migration. These processes are documented in Sections 3.7 and 3.8 of the BellSouth Ordering Guide, located on Interconnection website (http://www.interconnection.bellsouth.com./guides/lso_r_i2C/index.htm). BellSouth processes simple listings electronically and complex listings manually. Mechanization for complex listings has not been addressed by OBF.
45. AT&T complained that BellSouth is unable to process directory listings orders for valid telephone numbers assigned by AT&T from the LERG (as opposed to numbers ported from BellSouth) without a miscellaneous account number to facilitate processing of the

orders. AT&T further complains about this manual process (AT&T at 62; Hassebrock Affidavit [AT&T] ¶¶ 66-70).

46. Although BellSouth does manually process directory listings orders for valid telephone numbers assigned by AT&T from LERG, BellSouth does not believe it to be a cumbersome process, as AT&T suggests. BellSouth requires assignment of a miscellaneous account number to facilitate this ordering process. The process is described in Section 3.7 of the BellSouth Ordering Guide, located on the BellSouth Interconnection website (http://www.interconnection.bellsouth.com./guides/lsor_i2C/index.htm).

MAINTENANCE AND REPAIR

47. TRA complained that BellSouth delays the repair of resale services and makes disparaging remarks about CLECs (TRA at 27).
48. BellSouth does not intentionally delay repairs of resale services. Such repairs are performed in the same time and manner as those for retail services, as demonstrated by BellSouth's Service Quality measurements. Further, all BellSouth employees are trained to refrain from making disparaging remarks about or to CLECs and their customers. BellSouth network customer interface work groups have placed further emphasis on such training through additional coverage.

LOSS NOTIFICATION

49. Sprint complained that BellSouth is not providing lost customer notification (Closz Affidavit [Sprint] ¶ 68).
50. BellSouth has manual and electronic notification processes in place to notify resellers of customers lost to other local service providers (Funderburg affidavit, ¶¶ 141-143). An electronic customer notification report has been developed by BellSouth; it is currently being

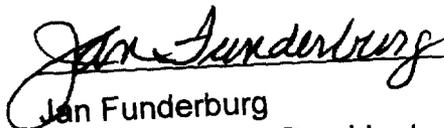
enhanced to include UNEs. This notification process was developed in adherence to industry standards.

51. ITC DeltaCom learned of an electronic disconnect report in a workshop and complained that the BellSouth Account Team was not aware of this option (Rozycki Affidavit [CompTel/ITC Deltacom] ¶ 10).
52. BellSouth has recently developed an electronic notification report which is available to CLECs. This report mechanizes the paper loss notification identified in the Funderburg affidavit, Paragraphs 141-143. All Account Teams have been advised that the electronic disconnect report is available for CLEC use in tracking disconnects.

MISCELLANEOUS

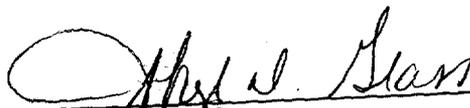
53. OmniCall accused BellSouth personnel of making disparaging comments regarding customer non-payment rights (OmniCall at 3-4).
54. As I have noted, BellSouth employees are trained to refrain from making disparaging remarks to end users regarding CLEC accounts. Further, BellSouth has been unable to verify that the employees referenced in the OmniCall accusation are BellSouth employees. BellSouth has no knowledge of this accusation, furthermore, activities of this type are contrary to BellSouth policy.

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



Jan Funderburg
Operations Vice President
Customer Services
BellSouth Telecommunications, Inc.

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



Notary Public

Notary Public, Fulton County, GA
My Commission Expires Sept. 14, 2000

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

In the Matter of)	
)	
Application by BellSouth Corporation,)	CC Docket No. 98-121
BellSouth Telecommunications, Inc.,)	
and BellSouth Long Distance, Inc., for)	
Provision of In-Region, InterLATA)	
Services in Louisiana)	

**REPLY AFFIDAVIT OF DOUGLAS W. MCDUGAL
ON BEHALF OF BELL SOUTH**

STATE OF Georgia
COUNTY OF Fulton

I, Douglas W. McDougal, being first duly sworn upon oath, do hereby depose and state as follows:

1. My name is Douglas W. McDougal. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am employed by BellSouth Telecommunications, Inc. as Director, Advanced Intelligent Network Planning and Local Number Portability Implementation. I am the same Douglas McDougal who filed an affidavit in this proceeding on July 9, 1998.

2. My affidavit is in response to allegations relating to long-term number portability (LNP) in the affidavits filed by Donna Hassebrock and Jay Bradbury on behalf of AT&T in this proceeding. Interim local number portability (ILNP) is discussed in the affidavit of Mr. Keith Milner.

3. Ms. Hassebrock (paragraph 56-58) claims that BellSouth is refusing to let carriers send electronic test orders before the new LNP system is cut over in Atlanta on August 31, 1998. She further alleges that BellSouth refuses to permit CLECs to test their ability to order LRN in Atlanta over Electronic Data Interchange (EDI) until the day the cutover occurs. Mr. Bradbury (paragraph 61-63), claims changes in availability of LRN for testing have adversely affected permanent portability plans.

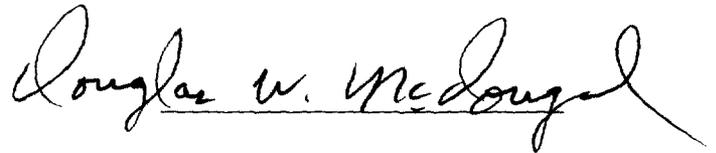
4. All three of these claims are related, and all three are erroneous. BellSouth began accepting permanent LNP orders for the Atlanta MSA on August 17, 1998 and will complete the implementation of LNP in the Atlanta MSA by the required date of August 31, 1998. Although BellSouth's official "go live" date for ordering LNP via EDI is August 31, 1998, BellSouth and AT&T jointly tested LNP Orders via EDI during the period from March 30, 1998 through April 6, 1998. This testing encompassed sending electronic orders, validating the data and holding several conference calls with AT&T to discuss results. Furthermore, BellSouth offered to conduct further tests of LNP ordering via EDI with AT&T prior to the August 31, 1998 "live" date. AT&T initially agreed to participate in this additional testing. However, on the business day prior to the scheduled date for testing, AT&T notified BellSouth that it was not going to participate due to lack of resources. Even though AT&T declined to participate, on August 17, 1998, BellSouth, MCI and MediaOne began industry testing of LNP order capability utilizing BellSouth's EDI interface. AT&T's comments are therefore not only erroneous, but also perplexing given their decision to pass on participation in the

current phase of "LNP over EDI" testing.

5. As described in detail in my previous affidavit, BellSouth is working diligently to complete the transition to the new Region 4 Number Portability Administration Center (NPAC) provider. BellSouth has undergone extensive testing with 11 competitive local exchange carriers (CLECs) since July 15, 1998. The test methodology utilized was developed initially in the Illinois trials and subsequently refined and used by the Southeast Test Team, an inter company subcommittee of the Southeast Operations Workshop, of which AT&T is an active participant. Industry End-to-End testing in the Atlanta MSA concluded successfully on Friday, August 14, 1998. Industry End-to-End testing began in the Miami, Ft. Lauderdale, Orlando and Tampa MSAs on Wednesday, August 19, 1998 and will continue through September 18, 1998.
6. This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief and knowledge.

Executed on August 21, 1998.



Douglas W. McDougal
Director,
AIN Planning and
LNP Implementation

STATE OF GEORGIA
COUNTY OF FULTON

Subscribed and sworn to before me
this 21st day of August, 1998.



Notary Public

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

In the Matter of
Application of BellSouth Telecommunications Inc.)
for Provision of In-Region, InterLATA)
Services in Louisiana)

REPLY AFFIDAVIT OF W. KEITH MILNER
ON BEHALF OF BELLSOUTH TELECOMMUNICATIONS, INC.

I, W. Keith Milner, being of lawful age, and duly sworn upon my oath, do hereby depose and state:

1. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth Telecommunications, Inc. ("BellSouth"). Having provided an affidavit supporting BellSouth's Section 271 application before the FCC, I herein respond to comments received on that application. Specifically, the purpose of my affidavit is to address new allegations raised by parties in this proceeding

regarding the means by which BellSouth has satisfied network-related items of the competitive Checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 (the Act).

2. While my affidavit does not address each and every anecdotal provisioning or maintenance complaint made by CLECs, I will, where CLECs provided sufficient details that allow a meaningful analysis, provide a direct response. In those cases where the CLEC has not provided sufficient details for BellSouth to perform a meaningful analysis, I will address the complaint more generally.
3. MCI alleges that BellSouth's customized routing method using Line Class Codes (LCCs) is unable to pass intraLATA toll and interLATA operator services traffic to interexchange carriers (IXCs) over Group D (FGD) trunks and will only use Modified Operator Signaling System (MOSS). Henry Affidavit (MCI), ¶ 37. Apparently, MCI is more interested in this topic as a possible roadblock to BellSouth's 271 applications than as a legitimate operational issue. BellSouth has not received a request from MCI or any other CLEC to adopt a different kind of signaling than it now uses. Moreover, while there has been considerable discussion between BellSouth and CLECs about the use of Line Class Codes (LCC) and/or Advanced Intelligent Network (AIN) for branding of operator services traffic, no requests or unanswered Bona Fide Requests (BFRs) are pending with MCI or any other CLECs relating to this issue. BellSouth is aware of a BFR for MCI in South Florida that resulted in tests in September 1997, dealing with LCC and various types of operator traffic. But this test was closed without request for additional follow-up by MCI. Similarly, on January 23, 1998, at MCI's request, BellSouth performed an informal test, without a BFR, of selective routing alternatives proposed by MCI involving BellSouth's Alpharetta,

Georgia 5ESS end office and BellSouth's Norcross, Georgia 5ESS access tandem. In the latter case, some calls were completed, while some calls were not completed. MCI told BellSouth that MCI would pursue several issues raised by this test with its own technical personnel. As late as February 5, 1998, however, MCI had not contacted BellSouth to pursue the matter further. To verify BellSouth's belief that no outstanding issues in this area were awaiting BellSouth's attention, BellSouth's Account Team for MCI contacted its MCI counterparts on August 19, 1998. MCI personnel advised the Account Team that there were no action items awaiting BellSouth's attention and expressed surprise at the purported urgency of the matter on the regulatory front. Further, when asked if BellSouth's current level of service was meeting their current operating needs in this area, the MCI personnel answered "Yes." The MCI personnel also stated that some additional services might be needed should MCI decide to offer directory assistance services or operator services in the future and that they would inquire within MCI to identify any unaddressed needs. BellSouth's Account Team repeated its willingness to explore any service arrangement that might be required to meet MCI's needs in the BellSouth region. MCI's claims in this proceeding of an urgent problem therefore are unfounded.

4. Based on the limited information available to BellSouth, the concept of using FGD for operator services signaling appears to present significant problems that will require technical investigation and testing. Should this approach prove feasible, time would be needed to develop and implement switching arrangements. BellSouth is willing to pursue this process with MCI or any other interested CLEC. However, further discussion of this proposal in the context of a 271 application is inappropriate since it is purely hypothetical at this point.

5. AT&T alleges that BellSouth intentionally shut down AT&T's 8YY trunks in Georgia for alleged nonpayment of charges. AT&T at 60; Hassebrock Affidavit (AT&T), ¶ 29. Ms. Hassebrock's version of this event leaves an incomplete and greatly distorted view of what actually happened. The facts of the matter are these: AT&T utilizes "8YY Back Haul" trunk groups in their Digital Link network to provide local service. AT&T delivers 800/888 traffic that belongs to other carriers over these trunk groups to BellSouth for processing. BellSouth then queries its 800/888 toll free calling database for these calls and routes them to the appropriate carrier for handling. AT&T is billed for database query and tandem switching charges on these calls. These trunk groups were built using a dummy billing number to meet service date requirements and to guarantee that AT&T would be able to meet its testing dates. Subsequently, AT&T did not provide the required billing information on the Access Service Requests (ASRs) to ensure that BellSouth could bill for this service. BellSouth's attempts to obtain this information from AT&T were unsuccessful. Test calls on the AT&T local network were completed but could not be billed properly because of the missing AT&T information. BellSouth was also receiving billing errors on test calls made improperly by AT&T from Birmingham to Atlanta, also because of the missing account information. These calls appeared to have originated outside the LATA, thus signifying an interLATA call. These billing errors resulted in lost revenue to BellSouth that could not be recovered.
6. BellSouth did inadvertently remove from service AT&T's 8YY trunk groups in Georgia on the afternoon of June 8, 1998. The service was restored later that same day. As for the missing billing information, AT&T has provided the account information, and BellSouth produced bills that verified proper billing will occur.

BellSouth will also be able to identify any interLATA call that is passed to BellSouth, in violation of appropriate tariffs, from the AT&T local network rather than the AT&T interLATA network.

7. AT&T alleges that BellSouth delayed a trunk rollout in Florida for 30 days because of overwhelming trunk demand by other CLECs. AT&T comments at 60; Hassebrock Affidavit (AT&T), ¶ 28. BellSouth is not aware of any such delay or proposed delay. AT&T further alleges that BellSouth made unilateral changes to the provisioning schedule for the Route Index-Portability Hub (RI-PH) method of interim number portability that extend a six-week provisioning interval. Hassebrock Affidavit (AT&T), ¶ 35. BellSouth denies this allegation. There have only been two projects in Florida of the apparent magnitude alleged by AT&T. In neither project did BellSouth's Account Team for AT&T, or any other BellSouth employee (to the best of BellSouth's knowledge), propose any 30-day delay. In the first project in early 1998, the Account Team advised that orders for a trunk rollout had been expedited to meet an AT&T desired date at the end of February. In the second project, BellSouth again expedited orders to meet an AT&T desired due date. On June 20, 1998, AT&T ordered Route Index-Portability Hub (RI-PH) functionality in 61 BellSouth end offices in Florida. Given the complexity of the request, the normal due date would have been July 30, 1998 which was thirty working days after receipt of the orders. AT&T's desired due date was July 15, 1998. The responsible BellSouth work group initially scheduled the work in the 61 offices in the following segments: Twenty-four (24) offices were due to be completed July 19, 1998. Six (6) offices were due to be completed July 14, 1998. Twelve (12) were due July 21, 1998. The remaining 19 were due July 28, 1998.

8. When the BellSouth Account Team for AT&T reviewed the schedule, arrangements were made to expedite the orders. Expedited arrangements included one weekend of overtime work by BellSouth employees. As a result, all required work in all these offices was completed by July 11, 1998, four days before AT&T's desired due date and 19 days before the date a normal schedule would have produced.
9. Sprint alleges that BellSouth's failure to advise Sprint of call routing changes and failure to test such changes with Sprint contributed to service interruptions for Sprint's end user customers. Closz Affidavit (Sprint), ¶ 63. Ms. Closz's own exhibit (MLC-4) shows BellSouth's response to the isolated incident she cites. The problem was caused by a translations error related to one trunk group. The trouble report was received by BellSouth at 2:03 p.m. and was resolved at 4:15 p.m. that same day. Human errors can and do cause problems both for CLECs' end user customers and for BellSouth's end user customers alike. BellSouth has established two new work centers to handle interconnection trunk group coordination and NXX testing and activation specifically to address this type problem encountered by CLECs.
10. AT&T claims it is doubtful BellSouth has enough technicians available to handle the volume of work needed to perform unbundled loop or unbundled switch port cutovers. Falcone Affidavit (AT&T), ¶ 59. BellSouth is committed to being CLECs provider of choice and accordingly is fully committed to employing the appropriate forces to meet the demands of AT&T and all CLECs. BellSouth is prepared to complete work orders by the due date. When appropriate, BellSouth will assign large projects to the appropriate Account Team to assure project handling and dedicated central office personnel. Mr. Stacy has provided the

performance data showing that BellSouth is successfully handling all unbundled switch ports that CLECs request.

11. AT&T claims that the manual reconnection of the unbundled loop and unbundled switch port will waste collocation and distributing frame space so that there will be insufficient space for CLECs that later seek to place their own equipment (other than UNEs) in a BellSouth central office. Falcone Affidavit (AT&T), ¶ 55. BellSouth will allow CLECs to obtain less than 100 square feet for Physical Collocation when an equipment arrangement enclosure is not utilized. This will conserve central office floor space. Likewise, the use of virtual collocation conserves central office floor space. BellSouth has and will continue to make additions to the capacity of its distributing frames as needed to accommodate growth, both for BellSouth's growth requirements and the growth requirements of CLECs using UNEs.
12. AT&T claims that manual reconnection of the unbundled loop and the unbundled switch port will preclude CLECs from combining other unbundled elements, most notably dedicated transport with the loop and with the switch. Falcone Affidavit (AT&T), ¶ 132. AT&T is mistaken. Should AT&T wish to combine an unbundled loop with unbundled transport, it may do so within its collocation arrangement. BellSouth will deliver both unbundled loops and unbundled dedicated transport facilities to AT&T's collocation arrangement. AT&T is free to cross-connect the loops and transport facilities in any manner it chooses. Similarly, BellSouth delivers unbundled loops and unbundled switch ports to a AT&T or any CLEC's collocation arrangement and, here again, AT&T or the CLEC may cross-connect the unbundled loop and unbundled switch port in any manner the CLEC desires.

13. MCI claims that the concentration capability of the Digital Loop Carrier (DLC) equipment is critical for access to unbundled loops. Henry Affidavit (MCI), ¶ 30. Mr. Henry mixes two different issues: loop unbundling and sub-loop unbundling. The sub-loop element Mr. Henry apparently refers to is called loop concentration/multiplexing. Notwithstanding that distinction, BellSouth makes all of its loops available on an unbundled basis including loops currently served by digital loop concentration equipment. For a fuller explanation of these methods, refer to my original affidavit in this proceeding at paragraphs 53–61.
14. AT&T claims that BellSouth will not be able to accommodate demand for new distributing frame connector blocks for CLECs. Falcone Affidavit (AT&T), ¶ 104. While space on distributing frames is a finite resource, this is not a consequence of local competition. Because of increasing retail demand, BellSouth has for many years been faced with the possible exhaust of space on distributing frames within its central offices. BellSouth has always effectively met those challenges - - a fact no party contests. As stated above (paragraph 11), BellSouth likewise will make needed additions to its distributing frames on a nondiscriminatory basis, as with other facilities such as switches and loop facilities, to accommodate AT&T's and other CLECs' needs.
15. AT&T claims the activity caused by installing new cross-connections on distributing frames will put unnecessary stress on the frame's jumper wires, thus causing service interruptions. Falcone Affidavit (AT&T), ¶ 113. AT&T is mistaken. For a further explanation, please refer to my original affidavit in this proceeding at paragraphs 47-48.
16. WorldCom and others claim that the reconnection of the loop and switch port through some manual process requires that the CLEC's end user customer must