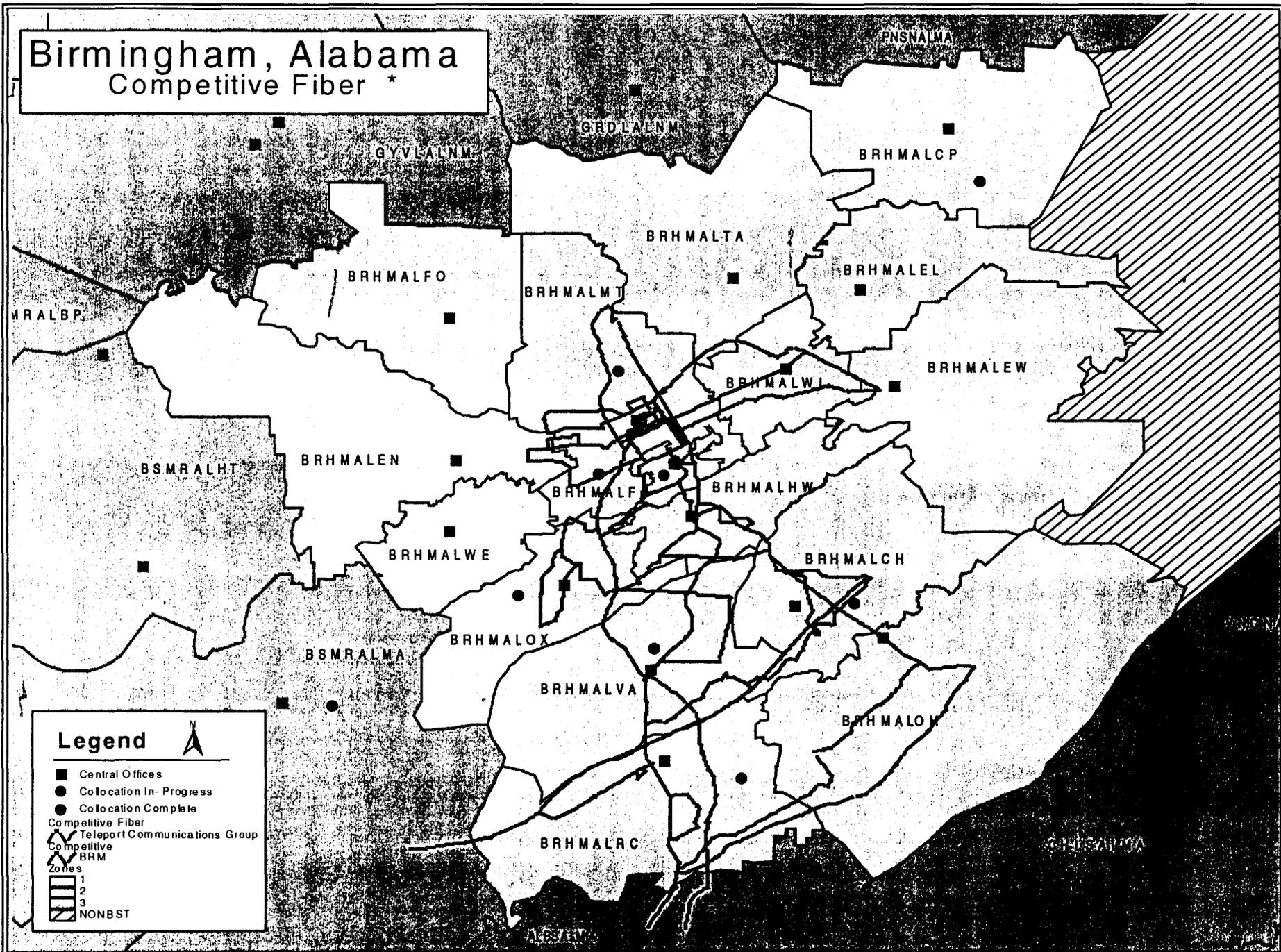


Birmingham, Alabama Competitive Fiber *

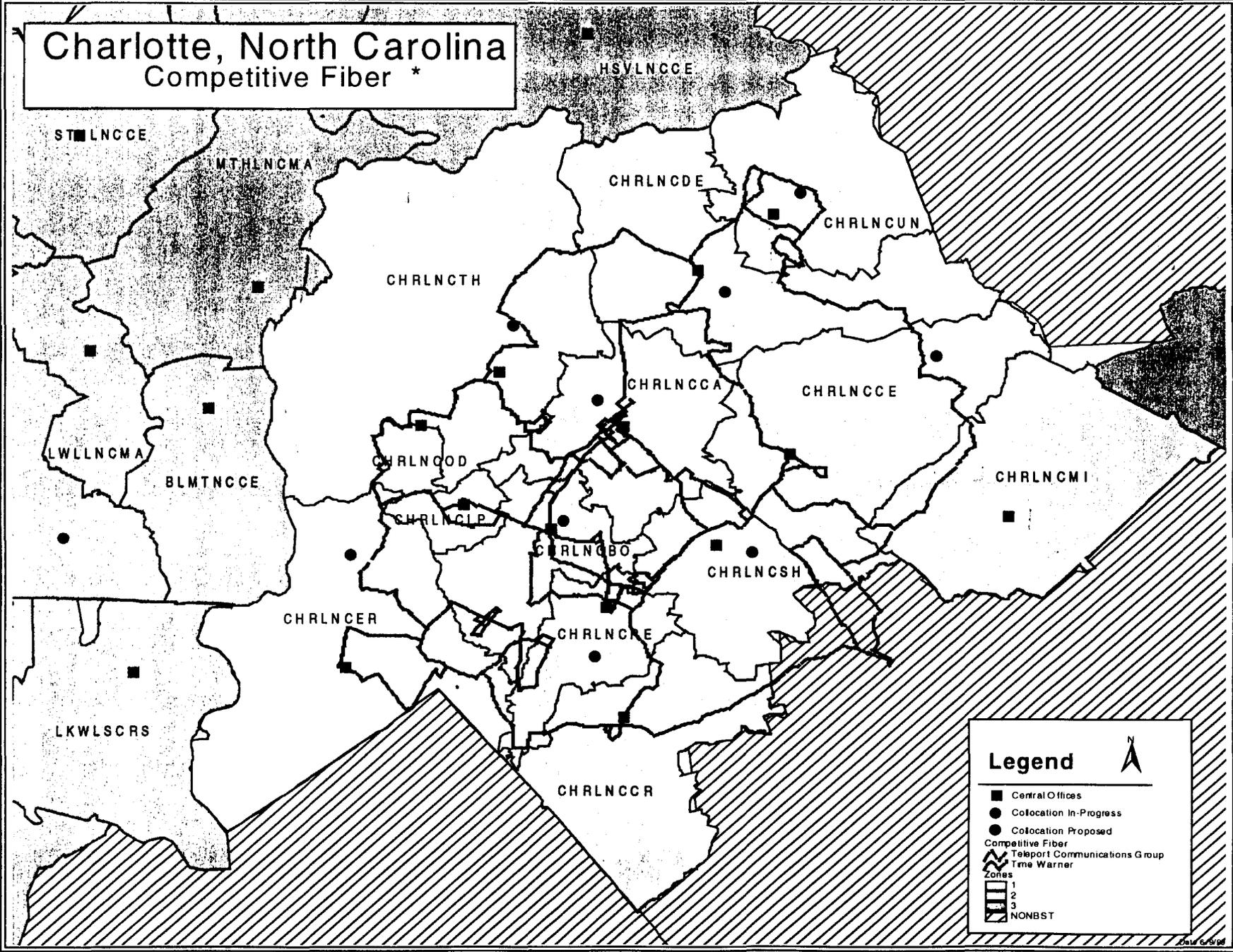


Legend

- Central Offices
- Collocation In-Progress
- Collocation Complete
- Competitive Fiber
- X Teleport Communications Group
- Competitive
- BRM
- Zones
- 1
- 2
- 3
- NONBST

* Additional existing utility company, CLEC, and/or CATV fiber not shown

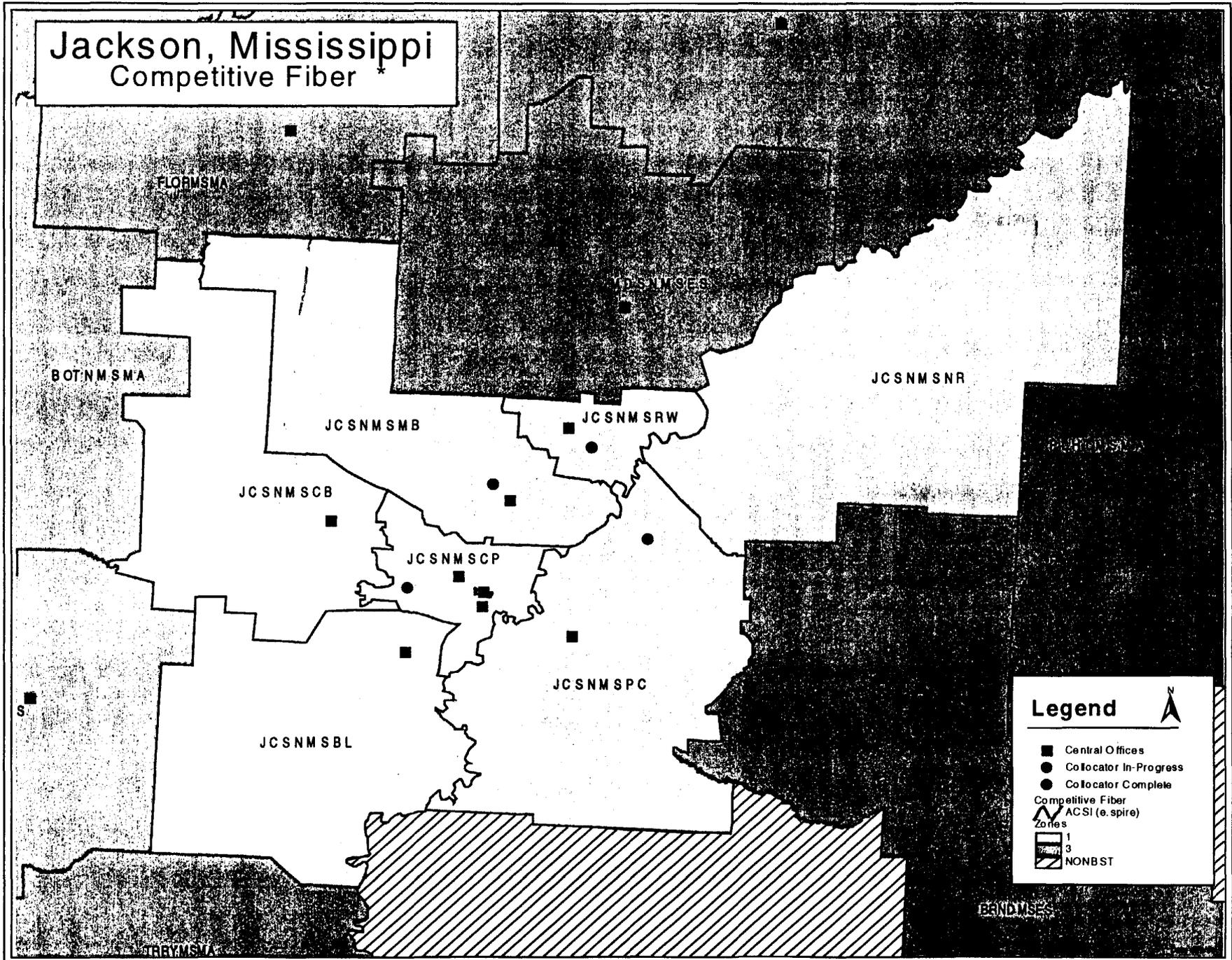
Charlotte, North Carolina Competitive Fiber *



* Additional existing utility company, CLEC, and/or CATV fiber not shown

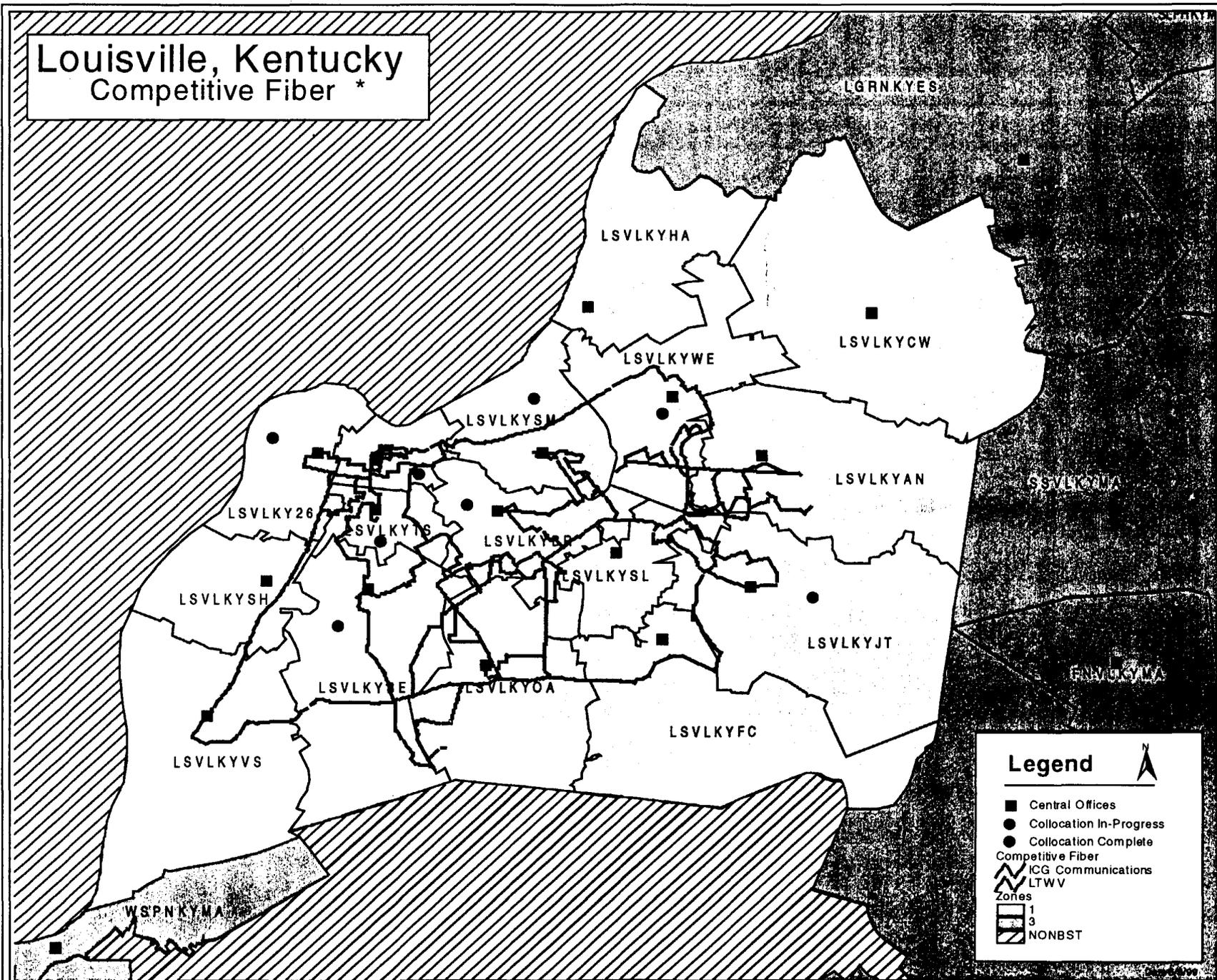
Rev 6/98

Jackson, Mississippi Competitive Fiber



* Additional existing utility company, CLEC, and/or CATV fiber not shown

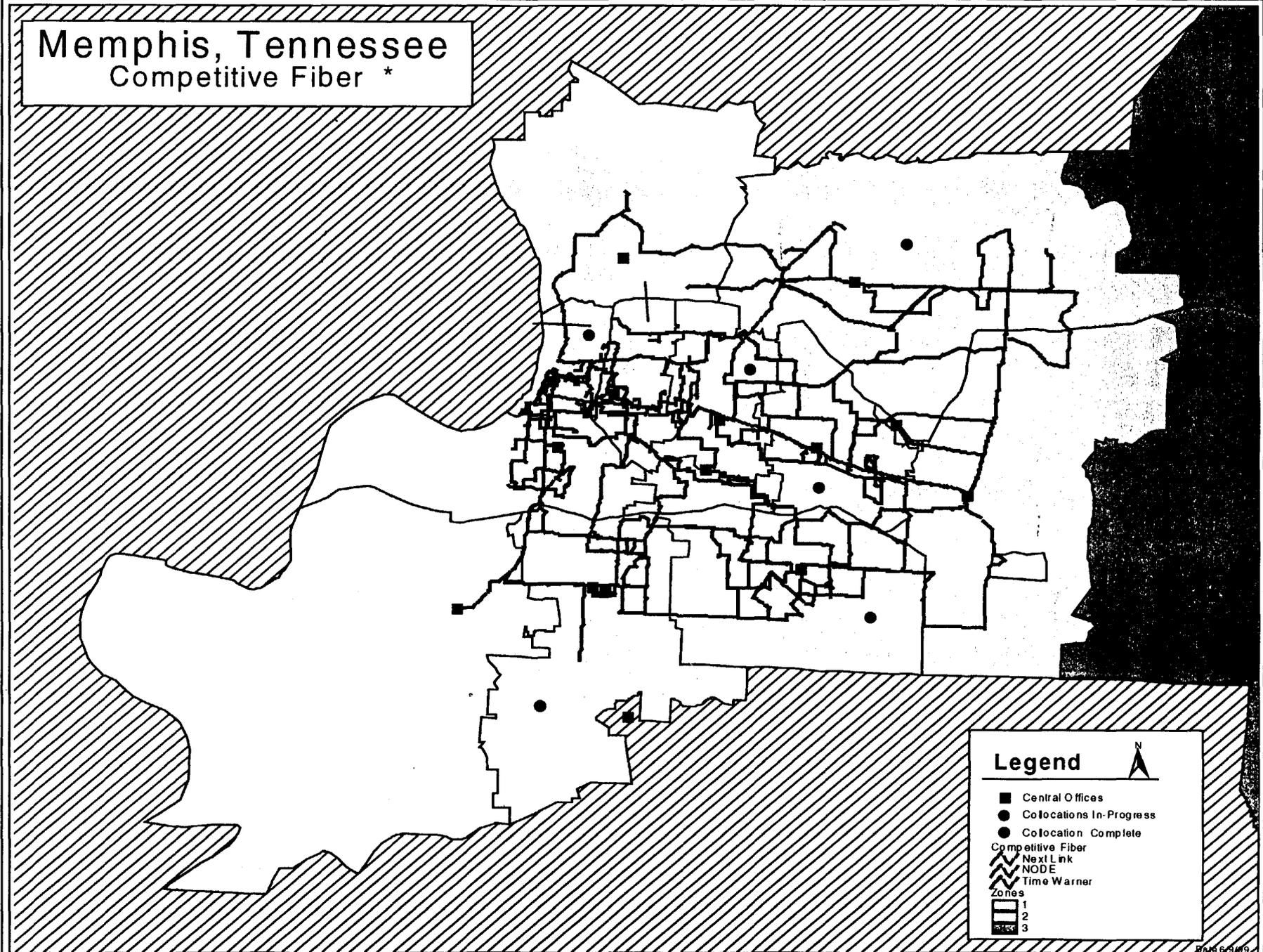
Louisville, Kentucky Competitive Fiber *



* Additional existing utility company, CLEC, and/or CATV fiber not shown

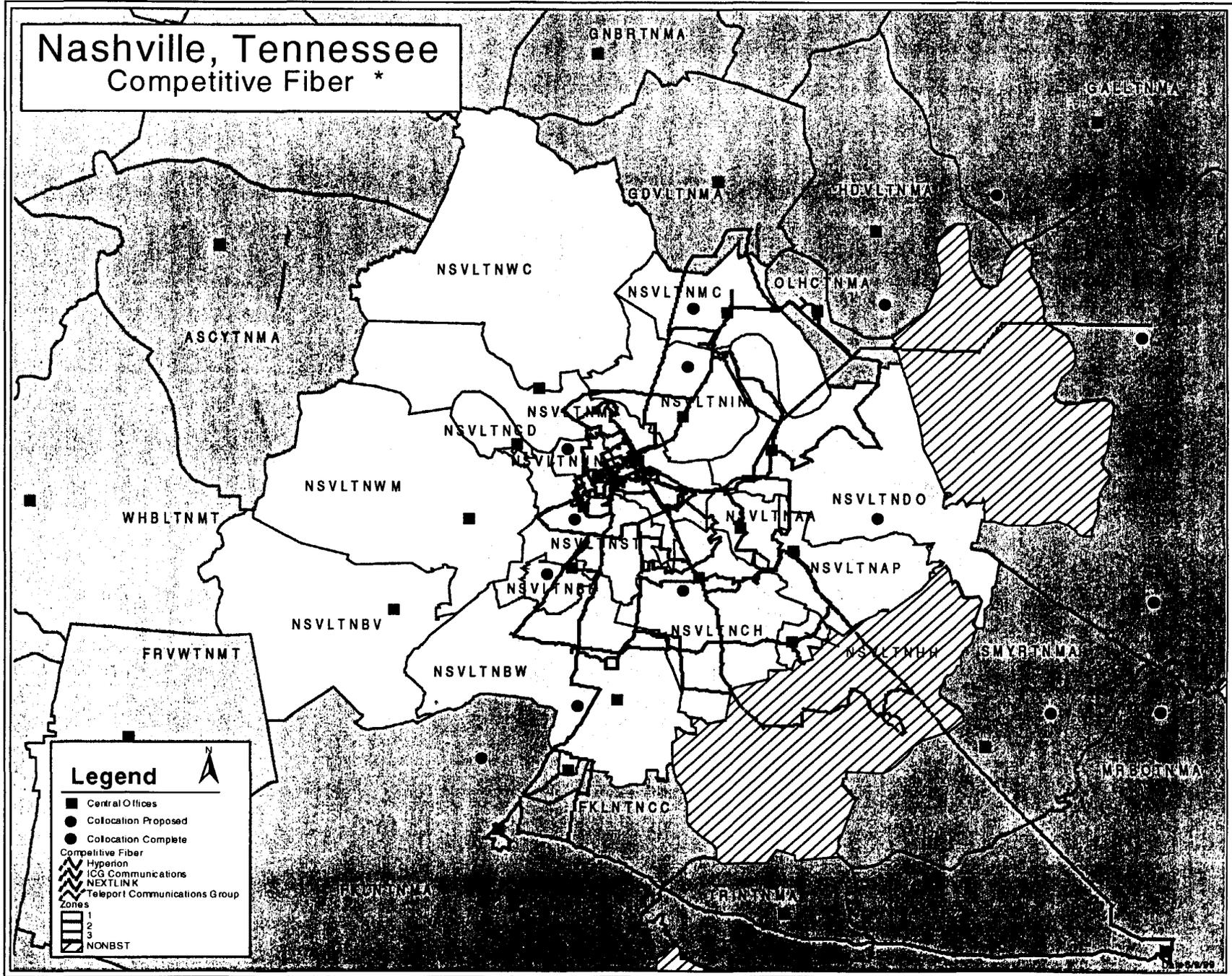
Memphis, Tennessee

Competitive Fiber *



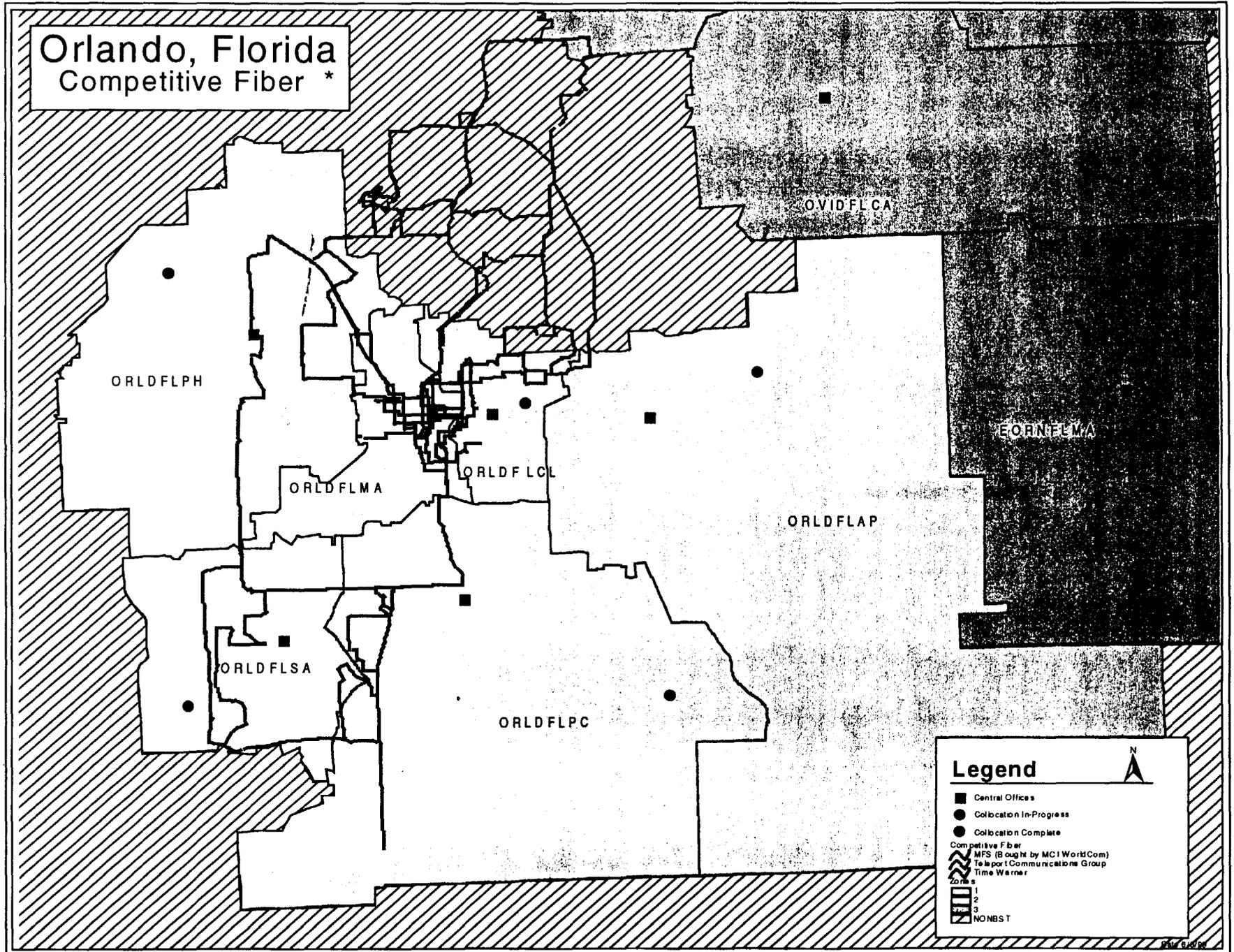
* Additional existing utility company, CLEC, and/or CATV fiber not shown

Nashville, Tennessee Competitive Fiber *



* Additional existing utility company, CLEC, and/or CATV fiber not shown

Orlando, Florida Competitive Fiber *



Legend

- Central Offices
- Colocation In-Progress
- Colocation Complete

Competitive Fiber

- ▨ MFS (Bought by MCI WorldCom)
- ▨ Time Warner
- ▨ Non-BST

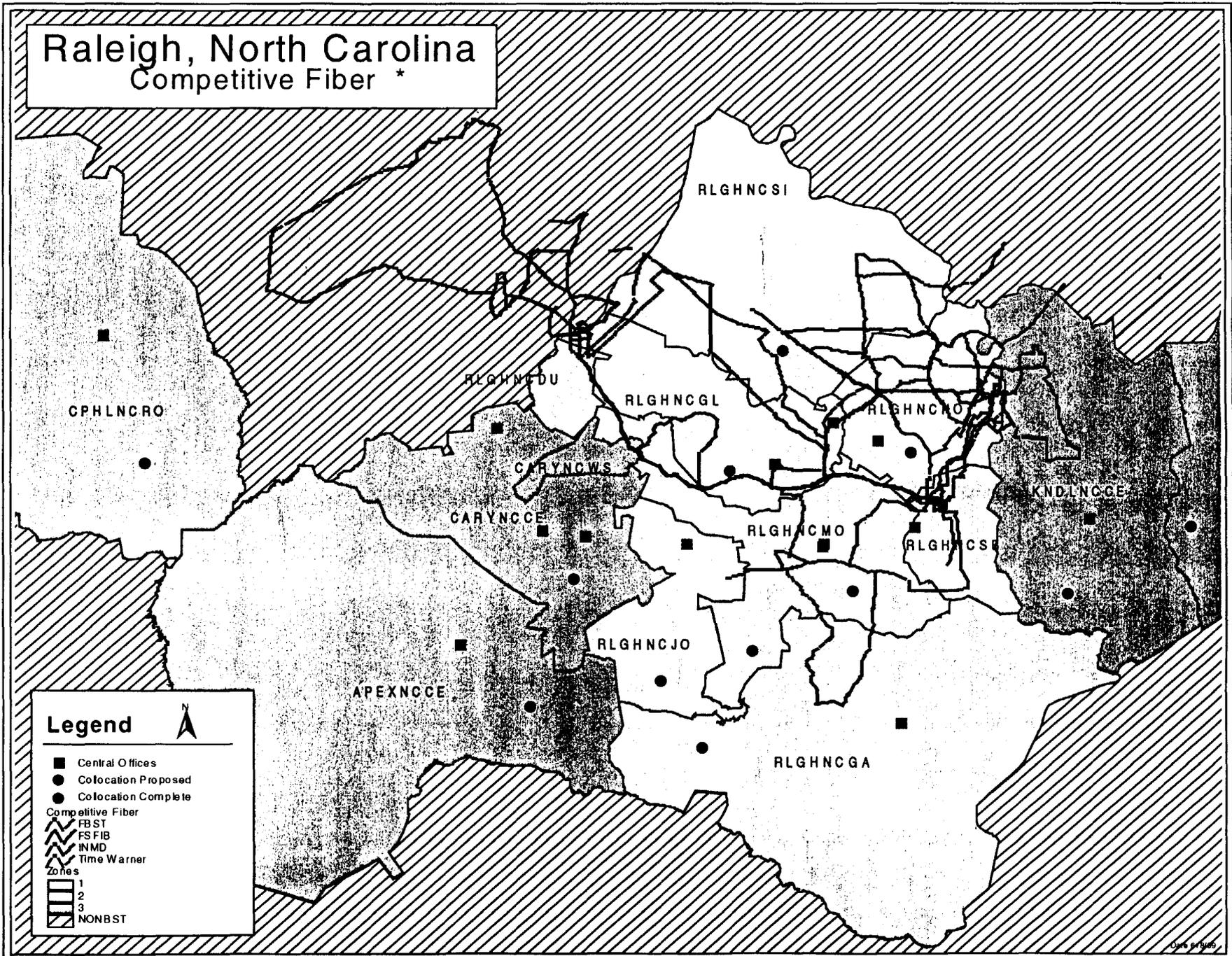
Zone

- 1
- 2
- 3

North Arrow

* Additional existing utility company, CLEC, and/or CATV fiber not shown

Raleigh, North Carolina Competitive Fiber *



Legend

■ Central Offices
 ● Colocation Proposed
 ● Colocation Complete

Competitive Fiber

- FBST
- FSFIB
- INMD
- Time Warner

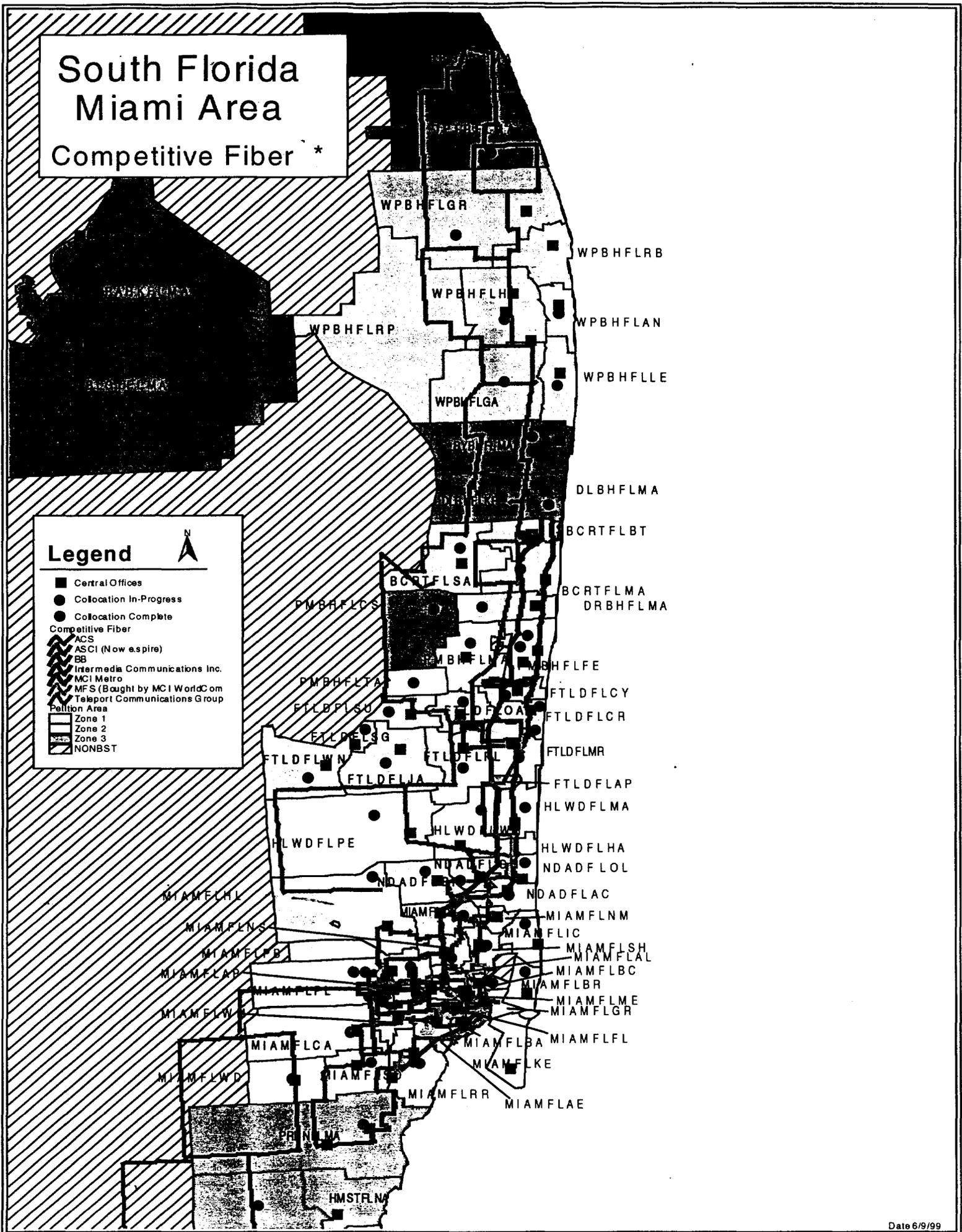
Zones

- 1
- 2
- 3
- NONBST

* Additional existing utility company, CLEC, and/or CATV fiber not shown

South Florida Miami Area

Competitive Fiber *



Legend

- Central Offices
- Collocation In-Progress
- Collocation Complete
- Competitive Fiber
 - ACS
 - ASCI (Now e.s.pire)
 - BB
 - Intermedia Communications Inc.
 - MCI Metro
 - MFS (Bought by MCI WorldCom)
 - Teleport Communications Group
- Service Area
 - Zone 1
 - Zone 2
 - Zone 3
 - NONBST

* Additional existing utility company, CLEC, and/or CATV fiber not shown

Attachment D

CLEC and BellSouth Switch
Deployment

BELLSOUTH-ALABAMA

Zone 1

24 Operational BellSouth Switches
18 in Birmingham
6 in Montgomery

Zone 2

17 Operational BellSouth Switches
6 in Huntsville
11 in Mobile

CLEC-ALABAMA

Zone 1

7 Operational CLEC Switches
5 in Birmingham
2 in Montgomery
6 Future CLEC Switches
3 in Birmingham
3 in Montgomery

Zone 2

2 Operational CLEC Switches
1 in Huntsville
1 in Mobile
2 Future CLEC Switches
1 in Huntsville
1 in Mobile

BLS_CLEC.doc

Operational CLEC Switch Data as of April 29, 1999
Future CLEC Switch Data as of April 21, 1999
Operational BellSouth Switch Data as of May, 1999

BELLSOUTH-FLORIDA

Zone 1

- 81 Operational BellSouth Switches
 - 9 in Fort Lauderdale (See also, Hollywood below)
 - 19 in Jacksonville
 - 32 in Miami
 - 7 in Orlando
 - 14 in West Palm

Zone 2

- 23 Operational BellSouth Switches
 - 5 in Daytona
 - 3 in Gainesville
 - 10 in Hollywood (Part of Fort Lauderdale, above)
 - 5 in Pensacola

CLEC-FLORIDA

Zone 1

- 36 Operational CLEC Switches
 - 4 in Fort Lauderdale
 - 7 in Jacksonville
 - 13 in Miami
 - 9 in Orlando
 - 3 in West Palm
- 23 Future CLEC Switches
 - 3 in Fort Lauderdale
 - 6 in Jacksonville
 - 9 in Miami
 - 5 in Orlando

Zone 2

- 5 Operational CLEC Switches
 - 3 in Daytona
 - 1 in Gainesville
 - 1 in Pensacola
- 3 Future CLEC Switches
 - 1 in Daytona
 - 1 in Gainesville
 - 1 in Pensacola

BELLSOUTH-GEORGIA

Zone 1

30 Operational BellSouth Switches

30 in Atlanta

Zone 2

26 Operational BellSouth Switches

2 in Albany

3 in Atlanta

5 in Augusta

5 in Columbus

4 in Macon

7 in Savannah

CLEC-GEORGIA

Zone 1

20 Operational CLEC Switches

20 in Atlanta

6 Future CLEC Switches

6 in Atlanta

Zone 2

10 Operational CLEC Switches

1 in Albany

3 in Augusta

4 in Columbus

1 in Macon

1 in Savannah

0 Future CLEC Switches

Operational CLEC Switch Data as of April 29, 1999

Future CLEC Switch Data as of April 21, 1999

Operational BellSouth Switch Data as of May, 1999

BELLSOUTH-KENTUCKY

Zone 1

19 Operational BellSouth Switches
19 in Louisville

Zone 2

0 Operational BellSouth Switches

CLEC-KENTUCKY

Zone 1

3 Operational CLEC Switches
3 in Louisville
4 Future CLEC Switches
4 in Louisville

Zone 2

0 Operational CLEC Switches
0 Future CLEC Switches

BELLSOUTH-LOUISIANA

Zone 1

20 Operational BellSouth Switches
20 in New Orleans

Zone 2

22 Operational BellSouth Switches
12 in Baton Rouge
3 in Lafayette
7 in Shreveport

CLEC-LOUISIANA

Zone 1

7 Operational CLEC Switches
7 in New Orleans
5 Future CLEC Switches
5 in New Orleans

Zone 2

7 Operational CLEC Switches
3 in Baton Rouge
2 in Lafayette
2 in Shreveport
8 Future CLEC Switches
4 in Baton Rouge
3 in Lafayette
1 in Shreveport

BELLSOUTH-MISSISSIPPI

Zone 1

8 Operational BellSouth Switches
8 in Jackson

Zone 2

0 Operational BellSouth Switches

CLEC-MISSISSIPPI

Zone 1

2 Operational CLEC Switches
2 in Jackson
0 Future CLEC Switches

Zone 2

0 Operational CLEC Switches
0 Future CLEC Switches

BELLSOUTH-NORTH CAROLINA**Zone 1**

32 Operational BellSouth Switches
16 in Charlotte
7 in Greensboro
9 in Raleigh

Zone 2

14 Operational BellSouth Switches
3 in Ashville
3 in Wilmington
8 in Winston-Salem

CLEC-NORTH CAROLINA**Zone 1**

17 Operational CLEC Switches
9 in Charlotte
3 in Greensboro
5 in Raleigh
18 Future CLEC Switches
6 in Charlotte
7 in Greensboro
5 in Raleigh

Zone 2

2 Operational CLEC Switches
1 in Wilmington
1 in Winston-Salem
2 Future CLEC Switches
1 in Asheville
1 in Wilmington

BELLSOUTH-SOUTH CAROLINA

Zone 1

12 Operational BellSouth Switches
12 in Columbia

Zone 2

21 Operational BellSouth Switches
9 in Charleston
7 in Greenville
5 in Spartanburg

CLEC-SOUTH CAROLINA

Zone 1

3 Operational CLEC Switches
3 in Columbia
1 Future CLEC Switch
1 in Columbia

Zone 2

4 Operational CLEC Switches
1 in Charleston
3 in Greenville
4 Future CLEC Switches
2 in Charleston
1 in Greenville
1 in Spartanburg

BELLSOUTH-TENNESSEE**Zone 1**

34 Operational BellSouth Switches
16 in Memphis
18 in Nashville

Zone 2

17 Operational BellSouth Switches
11 in Chattanooga
6 in Knoxville

CLEC-TENNESSEE**Zone 1**

12 Operational CLEC Switches
5 in Memphis
7 in Nashville
5 Future CLEC Switches
1 in Memphis
4 in Nashville

Zone 2

4 Operational CLEC Switches
1 in Chattanooga
3 in Knoxville
1 Future CLEC Switches
1 in Chattanooga

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

In the Matter of)
Implementation of the Local Competition Provisions) CC Docket No. 96-98
of the Telecommunications Act of 1996)

AFFIDAVIT OF W. KEITH MILNER
ON BEHALF OF BELL SOUTH 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"). I have served in my current role since February 1996 and have been involved with the management of certain issues related to local interconnection and unbundling.
2. I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina in 1970 with an Associate of Applied Science in Business

Administration degree. I graduated with a Master of Business Administration Degree from Georgia State University in Atlanta, Georgia in 1992.

3. My business career spans over 29 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operation in both the domestic and international arenas.
4. The purpose of my affidavit is to reconfirm for the Commission that BellSouth has adequate procedures in place to accommodate the cutover of end-users from BellSouth to CLECS, including AT&T, and to respond to comments filed in this docket by AT&T regarding the cutover process.
5. The requirements necessary to process a local service request (LSR) to establish, change, or disconnect a port/loop combination can be found in the Local Exchange Ordering (LEO) Implementation Guide for electronic ordering. Additionally, BellSouth has provided AT&T with AT&T-specific supplemental information intended to more fully relate BellSouth's processes to AT&T's processes to the degree that AT&T has been willing to share knowledge of their processes. Further, BellSouth has expressed its willingness to modify these guides as CLECs, including AT&T, identify operational gaps or efficiencies which could be achieved.
6. The process of cutovers for end-user services is a complex process requiring the attention of various skilled specialties. Constant attention to

staffing, training, and process conformance is required to assure that cutovers occur without undue disruption to the service being received by end-users. Yet, BellSouth's efforts to discuss possible improvements have often been met with indifference, despite AT&T's professed commitment to quality improvement procedures in all of its processes. For example, AT&T's personnel failed to attend a scheduled meeting of the Ordering and Provisioning Process Improvement Team as recently as Friday, January 29, 1999. This cancellation occurred without prior notification to affected BellSouth personnel and without AT&T offering a satisfactory explanation for its failure to attend.

7. Another example of the adversarial attitude BellSouth often encountered in dealing with AT&T is typified by a training request from AT&T for its ALS (AT&T Local Service) Work Center in Denver. The ALS Work Center requested training from BellSouth in order to improve the Work Center's processes and interactions with BellSouth's centers. BellSouth provided the requested training in early January 1999. Yet on January 26, 1999, AT&T's Carrier Relations Team in Atlanta wrote BellSouth complaining, not about the quality of the training, but rather that the training had occurred at all. BellSouth is mystified as to why AT&T would complain that BellSouth had provided the very training requested by AT&T.
8. In March, BellSouth recommended, and AT&T (ALS) Denver Work Center managers accepted, a joint process improvement initiative. On April 12, 1999, BellSouth received correspondence from Frank Ianna, President-Network Services, AT&T, to Charles Coe, President, BellSouth Telecommunications, Inc. Mr. Ianna requested BellSouth's cooperation in

reviewing all processes and procedures, from order entry through provisioning, with a particular emphasis on the process of cross-connecting a customer's unbundled loop to AT&T's switch and simultaneously porting the customer's local telephone number. BellSouth personnel made previously scheduled trips and attended meetings on April 15-16 and 20-22 with two separate groups in AT&T's Denver Work Center to address the very same ordering and provisioning issues raised in Mr. Ianna's letter. Action items for both companies were developed which pointed toward a truly cooperative effort at process improvement. Following the meeting, BellSouth developed responses to its action items, including specific commitments for BellSouth deliverables aimed at eliminating a major provisioning roadblock, and forwarded them to AT&T's Carrier Relations Team in Atlanta. BellSouth discovered one week later that those responses had not been forwarded by AT&T to its Denver location for review and action by the Work Center personnel knowledgeable in operational issues and affected by any change of operational procedures.

9. As discussed in the preceding paragraph, BellSouth developed a list of action items about BellSouth's process for review by AT&T. The BellSouth Account Team has attempted to gain AT&T's commitment to develop documentation of AT&T's internal process flow for review by BellSouth. To this date, it has not been received. Further, in attempting to develop an agenda for a follow-up meeting, the AT&T representative declined to put AT&T's process on the agenda for discussion and proposed that only BellSouth's process be discussed. Such an attitude

clearly stifles significant progress in resolving issues. It is common knowledge among those trained in quality measures that process improvement initiatives cannot move forward without all parties understanding and documenting what procedures are currently in place so that gaps, wherever they may be, can be identified and corrected. It is clear that Mr. Ianna's enthusiasm for process improvement efforts have not yet permeated to all levels of AT&T's organization.

10. The improvement review process requested by Mr. Ianna is underway, so BellSouth is disappointed to encounter the negative tone expressed regarding the hot cut process even in the comments AT&T filed in this proceeding. Despite AT&T's assertions, BellSouth's processes are quite capable of handling present and forecasted volumes of orders. However, the successful handling of a volume of orders not only requires BellSouth's systems and personnel to be ready, but also those of affected CLECs, including AT&T. In the month of April 1999, BellSouth processed four and one-half times as many orders for the largest CLEC in BellSouth's region than for AT&T, and three times as many as for the second largest CLEC than for AT&T. Also during April 1999, BellSouth cutover 70% of all CLEC orders requiring conversion within five (5) minutes, over 88% within 15 minutes, and all orders were cutover in an average of 6.94 minutes. For one CLEC's orders (which is not AT&T), 83% were cutover within five (5) minutes, 98% within 15 minutes, and all orders in an average of 3.30 minutes. Three things are revealed from a reading of these numbers. First, a high percentage of all CLEC conversion orders in the BellSouth Region are being satisfactorily