

EXHIBIT 1

"AMERITECH - Update to Final Requirements for the EDI/CORBA Pre-Ordering Release Scheduled for March 24, 2001 as a Result of the January 3, 2001 Walk-Through"

Date: January 22, 2001

Number: **CLECAMS01-007**

Contact: Account Manager

Category: OSS

This Accessible Letter provides updates to the Final Requirements for the Uniform and Enhanced Operational Support System Plan of Record (OSS POR) release as a result of the CLEC walk-through held on January 3, 2001. Final Requirements were included in Accessible Letters **CLECAMS00-075** (dated December 15, 2000) and **CLECAMS00-067** (dated November 22, 2000). The attachment to this letter contains the Revision Notes.

As stated in previous Accessible Letters, this release is scheduled for implementation on March 24, 2001, and includes enhancements to Electronic Data Interface (EDI) and introduces the Common Object Request Broker Architecture (CORBA) interface. Enhancements identified in the Uniform and Enhanced OSS POR includes:

- Implementation of Local Service Ordering Guidelines (LSOG) 4.
- Implementation of EDI mapping changes that will coincide with the published EDI Guidelines (ELMS 4).
- Implementation of an Ameritech Local Service Pre-Ordering Requirements (LSPOR) Version 4.0 document.
- Provision of a parsed Address Validation response and a parsed Customer Service inquiry response.
- Provision of a Pending Order Status inquiry and a Provisioning Order Status inquiry.
- Implementation of CORBA standards T1.265-1999 and T1.267-1999.

The updated Ameritech Revised Final LSPOR is voluminous and is not being distributed with this letter. It will be available via the CLEC Online web site at: <https://clec.sbc.com/> by Friday, January 19, 2001. Once this site is activated, select CLEC HANDBOOK, then any Ameritech state from the State Drop-Down menu and click the GO button. Next, select USERS GUIDES & TECH PUBS, then LSPOR.

Please direct any questions to your Account Manager.

Attachment



"LSPOR Revision
Notes.doc"

Note: The icon(s) that appear in this letter represent a large attachment(s). To view the attachment, visit our web site at:

<https://clec.sbc.com/restr/acclatters/>

EXHIBIT 2

On May 1, 2001 the Commission voted to adopt a Procedural and Scheduling Order to initiate a review of BellSouth Telecommunications, Inc. compliance with section 271 of the 1996 Federal Telecommunications Act. The Order approved by the Commission provided all interested parties with the opportunity to file initial comments on June 30, 2001; and reply comment were due on July 16, 2001. In response to the Commission's directive, BellSouth and Competing Local Exchange Companies submitted exhaustive comments.

After conducting an extensive review of the comments filed and application of the review standards established by the Federal Communications Commission (FCC), the Staff finds that BellSouth has meet the competitive checklist set forth in section 271 of the Act. The Staff bases it's finding on the totality of the evidence submitted by the parties. Since the passage of the 1995 State Telecommunication and Competition Development Act and the 1996 Federal Telecommunications Act, the Commission has conducted critically important proceedings concerning BellSouth's section 271 compliance open to participation by all interested parties. The Commission has provided for third-party testing of BellSouth's operations support systems (OSS) offerings. In addition, the Commission has adopted a broad range of performance measures and standards and initiated a Performance Assurance Plan designed to create a financial incentive for both, pre-entry and post-entry compliance with section 271.

As a result of the Commission's directives, BellSouth has undertaken the necessary steps to open its local exchange market to competition in Georgia. The FCC has repeatedly stated in its' previous Orders that the most probative evidence to demonstrate that local markets are irreversibly open is commercial usage. The Staff finds that as of July, 2001, competitive local exchange carriers (CLECs) served over 815,000 local lines in BellSouth's Georgia service area. This total includes over 715,000 facilities-based access lines. BellSouth is providing more than 261,000 interconnection trunks and 700 collocation nodes to CLECs. In addition BellSouth is providing more than 228,000 unbundled local loops, including more than 84,000 stand-alone unbundled local loops and more than 144,000 unbundled loops provided as part of an unbundled network element platform (UNE-P). There is also an active resale market in Georgia. BellSouth provides more than 100,000 resold local exchange lines, including 27,000 business lines and 73,000 residential lines. These results bear out the fact that BellSouth has made extensive efforts to open its local markets in compliance with the requirements of the Act.

STAFF RECOMMENDATIONS

- 1. Docket 6863-U** **Adopt Staff recommendation that BellSouth has met Track A and the 14-point checklist items as prescribed by Section 271 of the Federal Telecom Act of 1996.**

- 2. Docket 7253-U** **Approve BellSouth's Statement of Generally Available Terms and Conditions ("SGAT").**

- 3. Docket 8354-U** **Adopt the Third Party Test Final Report findings.**

- 4. Staff recommends that BellSouth implement the following OSS upgrades:**
 - a. Implement by January 5, 2002 a "C" order by which N and D orders complete together in sequence to prevent loss of dial tone.**
 - b. Implement by November 3, 2001 migration by Telephone Number and name.**
 - c. Implement fully fielded parsed CSRs by January 5, 2002.**
 - d. Increase reject correction time limit from 10 days to 30 days by November 3, 2001.**
 - e. Implement by January 2, 2002 electronic ordering for line splitting.**

For the OSS upgrades listed above, Staff recommends that the Commission assess penalties of \$10,000 per day for every day past the implementation schedules as spelled out in Staff recommendation.

EXHIBIT 3

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STATE OF ALABAMA

ALABAMA PUBLIC SERVICE COMMISSION

MONTGOMERY, ALABAMA

IN RE: Petition for Approval of a
Statement of Generally Available Terms
and Conditions pursuant to Section 252(f)
of the Telecommunications Act of 1996 and
Notification of Intention to File a
Petition for In-Region InterLATA
Authority with the FCC pursuant to
Section 271 of the Telecommunications Act
of 1996.

DOCKET NO. 25835

VOLUME IV

CONTINUATION OF THE PROCEEDINGS

taken before the Alabama Public Service
Commission in the above-referenced matter
on Thursday, June 28th, 2001, commencing
at 8:35 A.M. in the hearing room of the
Alabama Public Service Commission, Room
904, RSA Union Building, 100 Union
Street, Montgomery, Alabama, before Ricky
L. Tyler, Certified Shorthand Reporter
and Notary Public in and for the State of
Alabama at Large.

COPY

1 MR. HOPKINS: Mr. Bradbury is
2 available for cross.

3

4

CROSS-EXAMINATION

5

BY MR. MCCALLUM:

6 Q. Good afternoon, Mr. Bradbury; my name is
7 Fred McCallum; I represent BellSouth. I
8 want to start this afternoon with just
9 some basic information on interfaces that
10 AT&T uses. What interfaces does AT&T use
11 for obtaining pre-ordering information
12 today?

13 A. We currently are using LENS and TAG.

14 Q. And how long have you been using LENS and
15 TAG, just approximately?

16 A. We've been using LENS probably from the
17 1997 time frame.

18 Q. Okay.

19 A. TAG not until probably sometime in '99,
20 2000 possibly.

21 Q. Okay. And what interface does AT&T use
22 for obtaining ordering information?

23 A. We are now using both EDI and LENS.

- 1 Q. And roughly how long have you used both
2 of those?
- 3 A. We've began using EDI in 1997. We began
4 using LENS on a production basis this
5 year.
- 6 Q. Okay. Now, the first issue that you
7 talked about deals with -- substantive
8 issue deals with parsing, correct?
- 9 A. Correct, I do deal with parsing.
- 10 Q. And specifically parsing the Customer
11 Service Record?
- 12 A. Correct.
- 13 Q. Now, that also has to do with the concept
14 of integration, does it not?
- 15 A. Yes. A parsed Customer Service Record
16 would be integratable into the ordering
17 process.
- 18 Q. Okay. And integration, as you just said,
19 is the ability of a CLEC to automatically
20 populate information supplied by the
21 pre-ordering system, as I understand it,
22 onto an ordering form known as the
23 LSR --

- 1 A. That's correct.
- 2 Q. -- in a way that won't be rejected by the
3 BOC's system; is that correct?
- 4 A. That's correct.
- 5 Q. Now, can you describe for me what work
6 AT&T has been doing in its systems in
7 order to integrate pre-ordering with
8 ordering? And I guess for purposes of
9 this question you would be integrating
10 TAG with EDI, I would assume; is that
11 correct?
- 12 A. You're asking me to describe the work
13 that AT&T has been doing internally to do
14 that integration?
- 15 Q. Yes.
- 16 A. I'm sorry, I can't do that. I have not
17 been a part of that effort.
- 18 Q. Is there an effort like that going on,
19 though, at AT&T, to your knowledge?
- 20 A. I don't have any personal knowledge, but
21 I would be very surprised if it wasn't.
- 22 Q. You would be very surprised if it was
23 not?

1 A. Correct.

2 Q. Okay. And why is it that you don't have
3 any knowledge or any input into that
4 process?

5 A. It's just an area that I haven't spent
6 any time in. My dealings are to get from
7 BellSouth what our business units need in
8 terms of access to the interfaces; what
9 the business units then do to integrate
10 is not part of my regular job
11 responsibilities. I do know that we have
12 integrated in the past TAG with the EDI
13 interface and I know that work has been
14 done there and I would assume it's still
15 going on.

16 Q. Okay. You know that you have integrated
17 TAG with EDI; do you know approximately
18 when that occurred or when that was done?

19 A. Probably sometime in mid-to-late 1999.

20 Q. I will probably butcher this to death,
21 but as I understand it, parsing has to do
22 with how BellSouth delivers a customer
23 service record, the data stream of a

1 customer service record to AT&T; is that
2 correct?

3 A. That's correct.

4 Q. And the format in which it is given to
5 AT&T, correct?

6 A. Correct.

7 Q. And the whole goal behind that -- I
8 assume the whole goal of AT&T is to get
9 it into a format that would make it
10 easier for AT&T to integrate its
11 pre-ordering system with its ordering
12 system, correct?

13 A. Our goal would be to receive from
14 BellSouth that information in the same
15 format that BellSouth requires that we
16 send it back. This is very similar to
17 how BellSouth does it in their own
18 systems. When they retrieve a customer
19 service record, that information is
20 usable in their systems to generate an
21 order without a person having to manually
22 transfer information from the customer
23 service record image to the order that

1 they're working on; it's done
2 automatically in BellSouth's system. So
3 that functionality is what we're after
4 and the parsed data is required for that
5 functionality to operate.

6 Q. Okay. So your answer, if I understood
7 you correctly, said that what you want --
8 you want the parsed information because
9 you want the same functionality that you
10 contend BellSouth has. Let me back up
11 and ask you the question I was trying to
12 ask. If BellSouth were to give you this
13 parsed information in this format, would
14 it be of any assistance to AT&T in
15 integrating its TAG and EDI interfaces?

16 A. Certainly. It should improve the
17 reliability with which we're able to do
18 that. Without the parsed stream coming
19 at us, we have to make assumptions about
20 where to divide that and what it should
21 be, because we don't know exactly what it
22 is. We can make some intelligent guesses
23 and we have done that. When we guess

1 wrong and we generate an order using that
2 information, it may reject. If we had
3 the information coming to us exactly as
4 it should go back, we don't have to guess
5 any more, our rejection rates go down.

6 Q. Are you aware of any other CLECs who have
7 integrated their pre-ordering and
8 ordering interfaces that it uses to
9 submit orders to BellSouth?

10 A. I don't have any personal knowledge.
11 I've read BellSouth's testimony that
12 there are a number of them who apparently
13 have done some integration work.

14 Q. Okay. Well, you've gotten to it. You
15 haven't done anything individually to
16 find out or ask other CLECs if they --
17 what they've done as far as integrating
18 pre-ordering and ordering, correct?

19 A. No, I have not.

20 Q. Has AT&T, to your knowledge, done
21 anything with regard to asking other
22 CLECs, talking with other CLECs about
23 whether they've been able to integrate

1 BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION
2 DOCKET NO. 2001-209-C

3 BELLSOUTH TELECOMMUNICATIONS, INC.,

4 Applicant,
5 and

6 VOLUME X

7 AT&T OF THE SOUTHERN STATES, INC.,
8 UNITED TELEPHONE COMPANY OF THE CAROLINAS
9 and SPRINT COMMUNICATIONS COMPANY,
10 SOUTH CAROLINA CABLE TELEVISION ASSOCIATION,
11 NEWSOUTH COMMUNICATIONS CORP., US LEC OF SOUTH
12 CAROLINA, INC., RESORT HOSPITALITY SERVICES, INC.,
13 MCI WORLDCOM COMMUNICATIONS, INC., MCI WORLDCOM
14 NETWORK SERVICES, INC., and MCImetro ACCESS
15 TRANSMISSION SERVICES, LLC (collectively "WorldCom"),
16 ACCESS INTEGRATED NETWORKS, INC., SOUTHEASTERN
17 COMPETITIVE CARRIERS ASSOCIATION, NUVOX
18 COMMUNICATIONS, INC., ITC^DELTACOM COMMUNICATIONS,
19 INC., KMC TELECOM III, and CONSUMER ADVOCATE OF THE
20 STATE OF SOUTH CAROLINA,

21 INTERVENORS,

22 DATE: August 29, 2001

23 TIME: 10:00 AM

24 LOCATION: Before the South Carolina Public
25 Service Commission, Columbia, SC

REPORTED BY: J. LeVeque and Jane G. LaPorte
Court Reporters

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1 Analyze what I bring, too. I'm not saying my data
2 that is here isn't subject to your examination. Take
3 it in and consider it as you should theirs. But when
4 they bring you something that they say: I'm going to
5 substitute this, because I don't have that right data
6 in South Carolina.

7 Q. Let's move on to integration. You start
8 off the preordering section in your testimony saying:
9 Purposes of preordering integration. For purposes of
10 preordering, you say that integration, quick response
11 times are what is important, right?

12 A. Those are key elements in integration,
13 yes.

14 Q. Now, if I understand right, AT&T uses, in
15 Alabama, TAG and LENS for preordering, right?

16 A. That's correct.

17 Q. And LENS and EDI for ordering, right?

18 A. That's right.

19 Q. Now, the interfaces, if you were to
20 integrate the preordering and ordering together there
21 would be the TAG and EDI interfaces that you would
22 enter, correct?

23 A. That's correct.

24 Q. Now, if I got it right from Alabama, AT&T
25 integrated the tag preordering and EDI ordering

1 interfaces in mid to late 1999; is that correct?

2 A. That's correct.

3 Q. Did this include integration of the
4 information from the customer service record?

5 A. No, it didn't. Again, we faced the
6 situation there that the customer service record it
7 has transmitted today is not parsed in the fashion
8 that it's easily integrable.

9 Q. So, are you saying that AT&T has not
10 integrated any part of the customer service record to
11 go from its preordering to its ordering system. Or
12 it just hasn't integrated all of the customer service
13 record?

14 A. Hasn't integrated all. I can't say we
15 haven't integrated some piece of it. I know
16 specifically we haven't been able to do the
17 integration we would like to do with the customer
18 service and equipment section which would allow us --
19 what a customer has, put it into our systems to see
20 if that -- it's moot. The ordering system transcends
21 the order.

22 Q. All right. Other than customer services
23 and equipment, is there any other parts of the
24 customer service record that AT&T has been unable to
25 integrate?

1 A. I don't know with any specifics of which
2 part -- which other parts would have, no.

3 Q. Now, integration is the key for
4 preordering, right? One of the keys for preordering
5 that you said? I'm on Page 30 on mine. It's on
6 Page 35, Lines 5 to 11.

7 It's the question: How did BellSouth
8 preordering processes affect the CLECs' ability to
9 compete, toward the end of that. Are you with me?

10 A. Right. And I think we need to read --
11 the first sentence is really interesting. CLECs can
12 collect preordering information necessary to prepare
13 and submit an accurate order for services from its
14 customer from its own databases and from various
15 BellSouth databases.

16 So what we are really talking about is
17 taking preordering information and integrating it
18 into the ordering process. You don't just integrate
19 preordering by itself. You go into the order.
20 You've got integration when you take preordering
21 information, move it into the ordering process and
22 you need integration and rapid response times to do
23 that. One of the big gaps we had was the parsing of
24 the CSR.

25 Q. And what I'm trying to understand is, if

1 that's a key to -- I assume that's the key to -- one
2 of the keys for AT&T is being able to enter the local
3 market is the level at which it is able to integrate
4 the preordering and ordering systems, right?

5 A. That's correct.

6 Q. So, to what extent has AT&T actually done
7 that. You told us for purposes of the customer
8 service record, they have not been -- they have not
9 been able to integrate the customer services and
10 equipment section.

11 A. That's correct.

12 Q. I'm assuming you have discussed this with
13 the folks who actually need this information in order
14 to enter the local market in South Carolina and
15 elsewhere, or haven't you?

16 A. Yes.

17 Q. Is there anything else, other than the
18 customer services and equipment piece of the customer
19 service record that AT&T has not been able to
20 integrate?

21 A. Again, I don't know specifically, because
22 that was -- to me, that's a big enough hang-up.
23 That's where the customer service where you want to
24 investigate. You want to reorder through BellSouth's
25 ordering process. That's the key out of that area.

1 An area I know we did pick up out of there was the
2 listed directory address, that we picked up orders.

3 The problem is, without a parsed data
4 stream, what is required to be returned is the
5 development time to do this is significant. And you
6 get bombed out of the water, should BellSouth make a
7 change to the data stream that comes to you, as they
8 just did in July.

9 So anybody who had an integrated stream
10 at the end of July, no longer has one.

11 BellSouth has had before it, as an open
12 change request -- parsing change request for over two
13 years if BellSouth can't do it in two years, when
14 they've already done it in their retail operations,
15 what chance does the CLEC have of doing it accurately
16 and reliably?

17 Q. It's that chance I'm just trying to ask
18 you questions about. I'm trying to ask you what it
19 is that AT&T has done in that regard and what it
20 hasn't. So far, I think I understand that you
21 haven't been able to integrate preordering on the
22 customer service record, and this has to do with the
23 parsing issue, right?

24 A. Yes.

25 Q. Can you actually take the customer

1 service record, and be able to take the information
2 from it and take it from a preordering and put it
3 into your -- automatically into your order so you can
4 submit it to BellSouth, right?

5 A. That's correct.

6 Q. Now, I think we've gotten to you have
7 been able to integrate that preordering and ordering
8 for customer service records, with the exception of
9 the customer services and equipment section?

10 A. That's a rather large exception.

11 Q. And I understand.

12 A. Again, in discussing that with my folks,
13 when they said: We really can't do this section, I
14 didn't investigate all the other sections in the
15 level we had done them today. That section, by
16 itself, is enough. If I can't do that, then parsing
17 or integrating some other pieces of it is a minimal
18 return. I'm going to have to hand type all of that
19 or do something else with it. The minimal return
20 from the other sections of the business unit may or
21 may not depend to spend that money when I can't do
22 it.

23 Q. If AT&T comes across something that is
24 big to do in this area, then what you have said is
25 you have come to a key area that's big. So, you

1 haven't worked on doing those things you could do
2 that might not be so hard. Is that what --

3 A. They may not. Again, I haven't queried
4 in detail each of the individual sections we
5 integrated from the CSR.

6 Q. All right. So bottom line, the only one
7 you know of here today, of your own personal
8 knowledge of AT&T, is it has not been able to
9 integrate is the customer services, right?

10 A. That's correct.

11 Q. Now, you mentioned that you have to
12 manually type in this information if you can't
13 integrate from preordering to ordering?

14 A. That's correct.

15 Q. Now, can you tell me, how much time does
16 it take AT&T to type that information in, that it
17 still has to type in?

18 A. I don't have that information. I'm
19 sorry.

20 Q. All right. So you don't know how long it
21 takes AT&T to put this type of information onto the
22 order from the preorder, correct?

23 A. No, I don't.

24 Q. All right. But having this done
25 electronically and then to be able integrate is a

1 significant thing from AT&T's point of view in order
2 for it to be provided nondiscriminatory access and
3 meaningful opportunity to compete, right?

4 A. Correct, which is why we initiated the
5 parsed CSR request, and why we have problems with it
6 today.

7 Q. Are you aware of other CLECs who have
8 integrated preordering and ordering?

9 A. I don't have any detailed knowledge of
10 any of that. I understand some CLECs have done some
11 greater or lesser extents, but I don't know of any
12 that have done a complete job with the current data
13 stream. I don't believe it is possible to do it.

14 Q. Well, given the critical nature of this,
15 couldn't AT&T pick up the phone and called other
16 CLECs or talk to other CLECs about -- you know, are
17 you able to -- have you been able to do this? Or
18 figured this out?

19 A. Only casually as it comes up. In all the
20 discussions that I've had, no one -- I found no one
21 that has been able to do a significant amount of
22 integration with the unparsed data stream.

23 Q. Are you aware of third-party vendors?

24 A. Yes.

25 Q. Have they told you that they have

1 successfully integrated preordering and ordering
2 interfaces for BellSouth?

3 A. I haven't had any third-party vendor tell
4 me that; no, sir.

5 Q. What have third-party vendors represented
6 to you with regard to being able to integrate
7 information from BellSouth?

8 A. Actually very little. I have generally
9 been reading the trade press about third-party
10 vendors. I haven't approached any directly about
11 AT&T, but I don't have any, other than their press,
12 none of which indicates that any of them have
13 successfully made total integration of BellSouth's
14 requirements. And I have no other information.

15 Q. You remember we talked about this in
16 Alabama?

17 A. Yes.

18 Q. Okay.

19 A. I hope I have been consistent.

20 Q. You're close.

21 MR. McCALLUM: May I approach Mr.
22 Chairman?

23 COMMISSIONER SAUNDERS: Yes, sir.

24 Q. Mr. Bradbury, this is Alabama transcript.
25 We are trying to keep from killing trees. I think

1 we've got the print as little as we can get it. So
2 we are on Page 3003 of the Alabama transcript. That
3 hearing was held in late June, wasn't it?

4 A. Yes.

5 Q. And I asked you a question there: Are
6 you familiar with the third-party vendors who worked
7 with CLECs in the BellSouth integrated preordering
8 and ordering systems? And what was your answer
9 there?

10 A. I haven't found it yet.

11 Q. Right there. That's the question.

12 A. I am aware that there are third-party
13 vendors that do that type of work, yes.

14 Q. Then I asked you: And do you know any
15 third-party vendors who have developed the ability to
16 integrate preordering and ordering systems with
17 BellSouth? And what was your answer?

18 A. I know from reading the trade press that
19 there are a number who advertise that they have done
20 that. Whether they have, in fact, I don't know. You
21 might want to speak to one of their customers.

22 Q. All right, sir. So, we've got
23 third-party vendors who have advertised, to your
24 knowledge, that they have had the ability to
25 integrate preordering and ordering, right?

1 A. Yes.

2 Q. Now, have you talked with any of them,
3 set up appointments, try to gain any information as
4 far as what products they have available?

5 A. No, I haven't.

6 Q. Okay.

7 A. Again, that's in the trade press, and
8 they are advertisements.

9 Q. Would you agree that BellSouth is sending
10 AT&T the same exact information from the legacy
11 systems that it sends to BellSouth retail?

12 A. No, I would not. And very specifically,
13 information that has become available recently, it
14 absolutely is not the same. BellSouth has not
15 recently lost its ability to read customer service
16 records. The CLECs have.

17 Q. With that exception --

18 A. I don't think that's an exception.

19 Q. All right, sir. Let's see. Do you know,
20 for a fact, that the incident you just related has to
21 do with the level of information that is provided to
22 BellSouth retail versus the level of information it
23 provided to AT&T?

24 A. That's the only way I can explain it,
25 when BellSouth says to the CLECs: You can no longer

1 see this information on a customer service record
2 following installation of a change. I'm reading from
3 a carrier notification letter sent to CLECs on August
4 the 16th. At this time, CLECs are unable to view
5 CSRs utilizing circuit information. Additionally,
6 bill two numbers ending service orders nor the local
7 service order indicators can be viewed. BellSouth is
8 continuing to analyze and develop solutions to these
9 outstanding CSR problems.

10 I don't believe that the BellSouth retail
11 operation is going to no longer see this information.

12 Q. Do you know for sure?

13 A. I don't know for sure. But I think that
14 it would be a whole lot more fits going on if they
15 didn't. It would be different if we didn't have to
16 get this information and send faxes to BellSouth,
17 which tells me that BellSouth can retrieve this
18 information.

19 Q. When did that request -- when was that
20 request sent out?

21 A. This is not a request. This is a notice
22 of defect.

23 Q. When was it sent out?

24 A. August the 16th.

25 Q. 2001?

1 A. 2001.

2 Q. Okay.

3 A. And yes, on August the 28th there was a
4 defect notice sent for BellSouth talking about the
5 same thing, CLECs are unable to view the BTB --

6 MR. McCALLUM: Mr. Chairman, I asked the
7 witness -- I asked the witness what was the date on
8 the document. And he answered the question. I want
9 to object. I'm okay with speeches that are tied to
10 the question, but this is just one that's
11 unsolicited. I would object to that.

12 Q. All right, Mr. Bradbury, move to
13 electronic orders. Can you tell us what percentage
14 of AT&T orders are submitted electronically today?

15 A. Approximately 90 percent, yes, sir.

16 Q. Ninety percent?

17 A. Yes.

18 Q. Okay.

19 A. That's one I did research for Alabama.

20 Q. Do you know, overall, how many CLECs
21 orders are submitted electronically?

22 A. Yes, I do. Let me look at my current
23 information. I'm not good at math but, again, in
24 June of this year, Mr. Pate reported there were
25 40,449 manual orders. There were a total 359,782