

OVERVIEW OF REVISIONS TO BELLSOUTH'S MONTHLY STATE SUMMARY FOR GEORGIA

Introduction

Each month, BellSouth files with the Georgia Public Service Commission ("GPSC its Monthly State Summary ("MSS") Reports and Georgia Service Quality Measurements ("SQM") Data Reports.

The MSS contains BellSouth's aggregate performance data for each of the 75 performance measures adopted by the GPSC in its January 12, 2001 Order in Docket 7892-U. With the levels of product disaggregation ordered by the GPSC, there are approximately 2,250 sub-metrics reflected in the MSS each month. For each sub-metric, BellSouth reports as many as eight data points, depending upon the measure, including the BellSouth measure, the BellSouth volume, the CLEC measure, the CLEC volume, the Standard Deviation, the Standard Error, and Z-score, and the equity score.

The SQM Data Reports, which are also filed by BellSouth each month, contain aggregate performance data with additional levels of disaggregation as well as CLEC-specific flow through performance information.

March 2001

On May 7, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for March 2001.

On May 16, 2001, BellSouth filed its March 2001 Trunk Group Performance – Aggregate Report, which had previously been filed in the incorrect format, and revised the Billing – Usage Data Delivery Accuracy Report to correct certain errors.

On May 30, 2001, BellSouth filed revised Order Completion Interval and Total Service Order Cycle Time MSS data for March 2001 to correct discrepancies in the coding for a limited number of products.

BellSouth reported performance for 3,805 data points on its March 2001 MSS Reports. BellSouth revised 50 of these data points (1.31%).

April 2001

On May 30, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for April 2001. BellSouth reported performance for 3,822 data points on its April 2001 MSS Reports. BellSouth has not revised any of these data points (0.00%).

May 2001

On July 3, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for May 2001.

On July 10, 2001, BellSouth filed revised MSS data for May 2001 to: (1) correct errors in the calculations associated with the production of the Average Completion Notice Interval and Reject and Firm Order Confirmation Completeness measures; (2) correct errors in the reporting of performance data related to ISDN loops, jeopardizes, and BellSouth's retail ADSL service; and (3) correct clerical errors in other miscellaneous measures.

On September 26, 2001, BellSouth filed revised MSS data for May 2001 for five performance measures to include data relating to the retail analogue for unbundled interoffice transport that had previously been omitted.

BellSouth reported performance for 4,585 data points on its May 2001 MSS Reports. BellSouth revised 292 of these data points (6.37%).

June 2001

On July 31, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for June 2001.

On August 31, 2001, BellSouth filed revised MSS data for June 2001 to correct errors in the calculations of several provisioning measures associated with loop-port combinations and to include line sharing and xDSL performance data that had previously been omitted.

On September 26, 2001, BellSouth filed revised MSS data for June 2001 for five performance measures to include data relating to the retail analogue for unbundled interoffice transport that had previously been omitted.

On October 1, 2001, BellSouth filed revised MSS data to reflect changes in the calculation of the Percent Flow Through Service Requests and Percent Flow Through Service Requests – Achieved measures for June 2001.

BellSouth reported performance for 4,665 data points on its June 2001 MSS Reports. BellSouth revised 164 of these data points (3.52%).

July 2001

On August 31, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for July 2001.

On September 26, 2001, BellSouth filed revised MSS data for July 2001 to: (1) correct errors in the calculation of the Average Completion Notice Interval measures; (2) include data relating to the retail analogue for unbundled interoffice transport for five performance measures that had previously been omitted; (3) include data relating to the retail analogue for various held order measures that had previously been omitted; and (4) correct clerical errors in other miscellaneous measures.

On October 1, 2001, BellSouth filed revised MSS data to reflect changes in the calculation of the Percent Flow Through Service Requests and Percent Flow Through Service Requests – Achieved measures for July 2001.

On November 1, 2001, BellSouth filed revised MSS data to reflect changes in the calculation of the Percent Flow Through Service Requests and Percent Flow Through Service Requests – Achieved measures for July 2001.

BellSouth reported performance for 5,018 data points on its July 2001 MSS Reports. BellSouth revised 403 of these data points (8.03%).¹

August 2001

On October 1, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for August 2001.

On October 9, 2001, BellSouth filed its Percent Flow Through Service Requests (Summary) and Percent Flow Through Service Requests (Detail) reports for August 2001, which were omitted from BellSouth's October 1, 2001 filing because of an error in the flow through calculation.

On October 10, 2001, BellSouth filed various SQM reports that had inadvertently been omitted from BellSouth's October 1, 2001 filing.

On October 12, 2001, BellSouth filed revised MSS data for August 2001 to reflect a change in the source data for the response interval for one of BellSouth's Operational Support Systems accessed via the Local Exchange Navigation System ("LENS") and to correct the calculation of Firm Order Confirmation and Reject Response Completeness for local interconnection trunks.

On November 1, 2001, BellSouth filed revised MSS data to reflect changes in the Percent Flow Through Service Requests (Summary) and Percent Flow Through Service Requests (Detail) reports for August 2001.

BellSouth reported performance for 5,744 data points on its August 2001 MSS Reports. BellSouth revised 29 of these data points (0.05%).

¹ The 8.03% reflects the multiple revisions to Percent Flow Through Service Requests and Percent Flow Through Service Requests – Achieved measures for July 2001.

September 2001

On November 1, 2001, BellSouth filed its MSS Reports and Georgia SQM Data Reports for September 2001. BellSouth reported performance for 5,715 data points on its September 2001 MSS Reports. BellSouth has not revised any of these data points (0.00%).

Conclusion

In the MSS Reports filed by BellSouth for March through September 2001, BellSouth reported performance for 33,354 data points, only 938 of which were revised by BellSouth (2.8%). With the exception of July, the number of revisions has fallen steadily since June 2001, even though the level of performance data reported by BellSouth has increased significantly (in June BellSouth reported performance for 4,585 data points in its MSS Reports; in September BellSouth reported performance for 5,715 data points, which is an increase of approximately 25%). Finally, BellSouth's performance reporting has been relatively stable since BellSouth filed its application for in-region, interLATA authority in Georgia as evidenced by the relatively few revisions to BellSouth's August MSS Reports and by the fact that no revisions have been made to the September MSS Reports.

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Joint Application by BellSouth Telecommunications, :
Inc., et al., for Authorization to Provide :
In-Region, InterLATA Service in the states of : CC Docket No.01-277
Georgia and Louisiana pursuant to Section 271 :
of the Telecommunications Act :

**REPLY COMMENTS OF THE
GEORGIA PUBLIC SERVICE COMMISSION**

Lauren McDonald, Chairman
Stan Wise, Vice Chairman
Robert Baker, Commissioner
David Burgess, Commissioner
Bob Durden, Commissioner

Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334-5701

Before the
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of

Joint Application by BellSouth Telecommunications, :
Inc., et al., for Authorization to Provide :
In-Region, InterLATA Service in the states of : CC Docket No.01-277
Georgia and Louisiana pursuant to Section 271 :
of the Telecommunications Act :

**REPLY COMMENTS OF THE
GEORGIA PUBLIC SERVICE COMMISSION**

Lauren McDonald, Chairman
Stan Wise, Vice Chairman
Robert Baker, Commissioner
David Burgess, Commissioner
Bob Durden, Commissioner

Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334-5701

While, in the words of the DOJ, "CLEC complaints about this process abound," *Evaluation of the United States Department of Justice*, at 29, none of these complaints has been escalated to the Commission under the dispute resolution procedures of the CCP. The Commission also continues to monitor the CCP as part of the current performance measurements review, and various proposals to adopt new performance measures for monitoring the CCP are currently being discussed in industry workshops.

In the meantime, the Commission believes that, contrary to WorldCom's claims, the Georgia third-party test demonstrates the adequacy of the CCP. *Comments of WorldCom, Inc.* at 35. KCI conducted extensive tests of BellSouth's Change Management process, including the implementation of release of OSS 99, and found that BellSouth met all of the Evaluation Criteria for Change Management.¹¹ The Commission believes that the Georgia third-party test is strong evidence that the CCP is an adequate systems change management process to which BellSouth has adhered over time. *Bell Atlantic-NY Order*, ¶ 102; *SWBT-TX Order*, ¶ 116.

(d) Performance Measures and Data Integrity

Commenters' criticisms of BellSouth's performance measures and data fail into two broad categories. First, several commenters, including the DOJ, criticize the adequacy of the existing performance measurements approved by this Commission by order entered on January 12, 2001. See *Evaluation of United States Department of Justice*, at 35-37 (expressing concern "about the validity of a number of measures that should be revised to provide regulators and competitors with meaningful performance data"); *Comments of WorldCom, Inc.*, at 6-7 & 11; *Comments of Birch Telecom of the*

¹¹ KCI's Supplemental Test Plan Final Report filed on March 20, 2001. Pages VII-A-17-VII-A-28; Table VII-1.3 and Pages VIII-C-10-VIII-C-14; Table VIII3.3.

South, Inc., at 23-28. Importantly, these measures were established only after lengthy hearings in which numerous parties participated. Based upon the input from these parties and the evidence in the record, the Commission adopted a comprehensive set of performance measurements that, in the Commission's view, are reasonable and appropriate.

However, these performance measurements were never intended to be stagnant. On the contrary, the Commission established an ongoing process to review these performance measurements every six months to ensure that they are kept current and continue to serve the purposes for which they were adopted in the first place. The first such review is currently in progress, and a number of parties have submitted proposed revisions to the existing performance measurements that are under discussion in industry workshops overseen by the Commission Staff. The Commission Staff has completed four days of workshops, during which a number of concerns raised by commenters in this proceeding about BellSouth's performance measurements are likely to be resolved. These workshops, and not this proceeding, are the proper forum in which to address such concerns.

Second, commenters also criticize the accuracy of the performance data BellSouth reports. *Comments of AT&T Corp.*, at 31-32; *Comments of Birch Telecom of the South, Inc.*, at 7-15 (claiming that "BellSouth's data is demonstrably flawed"); *Comments of NuVox Communications, Inc. and Broadslate Networks, Inc.*, at 4-6 (claiming that "BellSouth's performance data is incomplete and inaccurate"). A number of these criticisms were considered and rejected by the Commission. *See Comments of the Georgia Public Service Commission*, at 129-134.

The Commission agrees with the DOJ that the FCC "should assure itself that it can be confident of the reliability of any performance data" that is "material" to the FCC's review. *Evaluation of United States Department of Justice*, at 38. The Commission believes that such assurances have been provided. In particular, as part of the third-party test in Georgia, KCI independently replicated BellSouth's performance reports from raw data submitted by BellSouth, in order to identify and investigate any discrepancies. At the Commission's direction, KCI has expanded its review of BellSouth's performance data. KCI is currently in the process of extracting additional data for comparison purposes as part of additional data integrity tests, validating calculations for the "new" performance measurements adopted in January 2001, and reviewing payments under the Commission's enforcement plan, including the statistical methodology used for remedy payment purposes.

On November 2, 2001, KCI submitted an interim report on the status of its metrics testing. As reflected in this report, two test criteria related to performance metrics that were "Not Complete" at the time KCI submitted its Final Report to the Commission have now been "Satisfied." In addition, only six metrics exceptions remain open, several of which (Exceptions 89, 136, and 137) appear close to being resolved. KCI's ongoing testing in addition to the Commission's annual review of BellSouth's data and performance measures, which are also subject to an independent third-party audit, provide ample assurances that BellSouth's performance data is reliable.

In addition, the Commission has had procedures in place since 1997 to resolve any data integrity issues – procedures that have never been utilized by a single CLEC in

Georgia.¹² Parties with data integrity issues also can address their concerns in the on-going industry workshops that are examining BellSouth's performance measurements. To date, despite four lengthy days of workshops, no such issues have been raised.

The Commission respectfully disagrees with the DOJ that BellSouth's "pattern" of restating performance data "makes it difficult to conclude that these data accurately depict BellSouth's performance and can be relied upon to establish benchmarks for future performance." *Evaluation of United States Department of Justice*, at 34. Any "pattern" of restating performance data is a result of the Commission's requirement that BellSouth's reported data be accurate and that any inaccuracies in such data be corrected promptly. BellSouth is subject to fines for "incomplete or revised" performance reports under the Commission's January 12, 2001 Order, and thus it is not surprising that BellSouth has filed revisions to its performance reports as soon as errors are discovered. BellSouth should hardly be penalized by the FCC for complying with this Commission's requirement that reported performance data be accurate, as even the DOJ seems to recognize. *Id.* at 33.

Furthermore, when focusing on the performance measurements that the Commission considered in assessing BellSouth's compliance with the requirements of Section 271, it is clear that BellSouth has not engaged in a "pattern" of restating its performance data (with the possible exception of flow through, which is discussed

¹² While not availing itself of the Commission's formal expedited dispute resolution procedures, in July 2001, Covad sought the Commission's assistance in addressing certain operational issues and in getting a better understanding of how BellSouth's performance data was calculated and reported. Under the Commission's direction, the parties have had an on-going dialogue. The Commission was under the impression that all of Covad's performance measurement issues had been resolved, although, based upon Covad's filing in this proceeding, that does not appear to be the case.

below). This is evident from a review of the June, July, and August performance data that BellSouth has filed.

In assessing nondiscriminatory access to pre-ordering functions, this Commission examined data for the following measures: Average Response Time and Response Interval (Pre-ordering and Ordering); Interface Availability (Pre-ordering and Ordering); and Loop Make Up Response Time. *See Comments of the Georgia Public Service Commission*, at 89-92. BellSouth has not restated its June, July, and August performance data for the Interface Availability and Loop Make-Up Response Time measures. While BellSouth did restate its performance for the Average Response Time and Response interval measurement in July and August 2001, the July revision was only made to include retail analogue data that had been omitted for two sub-metrics and the August revision was only made to a single sub-metric that did not change the underlying parity result.¹³

In assessing nondiscriminatory access to ordering functions, the Commission examined data for the following measures: Acknowledgement Message Timeliness; Firm Order Confirmation Timeliness; Reject Interval; and Average Jeopardy Notice Interval (the Percent Flow Through measure is discussed below). *See Comments of the Georgia Public Service Commission*, at 92-103. BellSouth restated its June 2001 performance data for only one of these measures – Average Jeopardy Notice Interval – and that restatement merely involved adding line-sharing data that had previously been omitted.¹⁴

¹³ BellSouth's October 12, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U; BellSouth's September 26, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U.

¹⁴ BellSouth's September 12, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U

BellSouth has not restated its July or August performance data for any of these measurements.

In assessing nondiscriminatory access to provisioning functions, the Commission examined data for the Percent Missed Installation Appointments and Average Order Completion Interval measures. *See Comments of the Georgia Public Service Commission*, at 103-107. BellSouth restated its June 2001 performance results for both of these measures. However, BellSouth merely added line sharing data and retail data for local transport that had previously been omitted and revised the order completion interval results for three of the 47 sub-metrics for which CLEC data was reported in June. BellSouth also restated its July 2001 performance results for both of these measures to add retail data for local transport that had previously been omitted.¹⁵ BellSouth has not restated August 2001 performance for either of these measures.

In assessing nondiscriminatory access to maintenance and repair functions, the Commission examined data for the following measures: Interface Availability (Maintenance & Repair); Response Interval (Maintenance & Repair); Missed Repair Appointments; Maintenance Average Duration; and Percent Repeat Troubles within 30 Days. *See Comments of the Georgia Public Service Commission*, at 107-111. BellSouth has not restated its June, July, or August performance data for any of these measurements.

In assessing nondiscriminatory access to billing functions, the Commission examined data for Invoice Accuracy measure. *See Comments of the Georgia Public*

¹⁵ BellSouth's September 26, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U; BellSouth's September 12, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U; BellSouth's August 31, 2001 Letter to Georgia Public Service Commission, Docket No. 7892-U.

Service Commission, at 111-112. BellSouth has not restated its June, July, or August 2001 performance data for this measurement.

BellSouth's restated performance results establish that BellSouth has not engaged in a "pattern of restatements" of the performance data that are material to the FCC's review. The one exception, which the DOJ cites as an example of how "problems can affect a single measure," is BellSouth's flow-through results, which BellSouth has revised several times for June, July, and August. *Evaluation of the United States Department of Justice*, at 34-35. The Commission has discussed with BellSouth the reasons for these revisions and is satisfied with BellSouth's explanation. The Commission also notes that such revisions generally resulted in a relatively minor variation in "achieved" flow-through performance. For example, in June 2001, BellSouth originally reported "achieved" flow-through results of 79.67% for residence, 41.13% for business, and 57.41% for UNEs; BellSouth's revised "achieved" flow-through results for June 2001 were 80.59% for residence, 41.32% for business, and 59.65% for UNEs. Likewise, in July 2001, BellSouth originally reported "achieved" flow-through results of 75.18% for residence, 49.41% for business, and 64.34% for UNEs; BellSouth's revised "achieved" flow-through results for July 2001 were 76.03% for residence, 49.61% for business, and 67.52% for UNEs.¹⁶ Such minor variations do not detract from BellSouth's flow-through performance, particularly in relation to other BOCs granted 271 relief, and

¹⁶ Docket No. 7892-U Performance Measurements; June Revised Flow Through Service Requests (Summary) and Revised Percent Flow Through Service Requests (Detail) Service Quality Measurement Reports filed on October 15, 2001 and July Revised Flow Through Service Requests (Summary) and Revised Percent Flow Through Service Requests (Detail) Service Quality Measurement Reports filed on October 31, 2001.

should not undermine the FCC's confidence in the reliability of BellSouth's performance data.

(e) UNE Combinations

Several commenters complain that BellSouth's procedures for UNE-P conversions cause customers to lose dial tone, which is an issue the Commission addressed in its comments. *Comments of the Georgia Public Service Commission*, at 134-136. The Commission found, based on the evidence presented, that the instances of lost dial tone as the result of BellSouth's use of a "D" (or disconnect) order and an "N" (or new) order for UNE-P conversions were isolated occurrences. In particular, the Commission found persuasive BellSouth's evidence that lost dial tone during UNE-P conversions for AT&T, Birch Telecom, and WorldCom from January to May 31, 2001 occurred less than one percent of the time - evidence that was corroborated by WorldCom's own experiences in Georgia.

The Commission stands by its findings, notwithstanding the comments by AT&T and WorldCom that attempt to portray the loss of dial tone during UNE-P conversions as a growing problem with the number of such conversions increasing. *Comments of AT&T Corp.*, at 10 & 38; *Comments of WorldCom, Inc.*, at 4. Interestingly, Birch Telecom, which previously raised concerns about lost dial tone during UNE-P conversions at the Georgia Commission, did not raise this issue in its FCC filing.

Based upon the information provided, both WorldCom's and AT&T's claims of lost dial tone as a result of BellSouth's use of N and D orders appear to be overstated. Although WorldCom claims that 1,988 or 3% of its customers in Georgia reported a loss of dial tone or the inability to receive calls, such problems may be unrelated to the UNE-

Three key adjustments were made to the August Flow-Through report.

Aggregate (combined Residence, Business, and UNE)

Company Info	LSR PROCESSING									FLOWTHROUGH		
	LESOG											
		Manual	Rejects		Validated	Errors						
Name	Total Mech LSR's	Total Manual Fallout	Auto Clarification	Pending Supps (Z Status)	LSR's	Total System Fallout	BST Caused Fallout	CLEC Caused Fallout	Issued SO's	Percent Achieved Flowthrough	Base Calculation	Percent Flow Through
TOTAL INTERFACES Original	383083	45880	43852	1772	291579	24477	15125	9352	267102	81.41%	91.61%	94.64%
<i>Planned Manual Adjustment</i>	+0	-9233	+0	+0	+9233	+9233	+6718	+2515	+0			
<i>TSIGNOUT Adjustment*</i>	+0	+0	+0	+218	-218	+7799	+5403	+2396	-7715			
<i>Dummy FOC Adjustment*</i>	+0	+0	+0	+0	+0	+8934	+8934	+0	-9085			
TOTAL INTERFACES Adjusted	383083	36647	43852	1990	300594	50443	36180	14263	250302	77.50%	83.27%	87.42%

* Minor variations in the reconciliation of these concurrent adjustments represent 0.0005 of validated LSRs and have a negligible impact on the results.



Job Aid
CG-CSRJ-001
Issue 1, February, 2001

CSR Job Aid

Interconnection Services

**CSR Job Aid
Copyright**

**CG-CSRJ-001
Issue 1, February, 2001**

Copyright

February, 2001

© BellSouth Telecommunications

Toni Addison
404/927-4305

Contents

Subject	Page
Introduction	v
Purpose	v
Version Information	v
1. CSR Job Aid	1
1.1 Preface	1
1.2 Audience	1
1.3 How to Use These Instructions	1
2. CSR Response from TAG	3
2.1 CSR Response from TAG	3
3. Overview of the CSR Response	5
3.1 Overview of the CSR Response	5
3.2 Status	5
3.3 Message Header	5
3.4 Customer Text List	5
3.4.1 CSR Header	5
3.4.2 Identification Section	6
3.4.3 List Section	6
3.4.4 Directory Section	6
3.4.5 Traffic Section	7
3.4.6 Bill Section	7
3.4.7 Service and Equipment Section	7
3.4.8 Remarks Section	7
3.4.9 Related Accounts Section	8
3.4.10 Billing Transfers Section	8
3.4.11 Completed Activity Section	8
4. Service Address	9
4.1 Service Address	9
5. Listed Address	11
5.1 Listed Address	11
5.1.1 Types of Listed Address	11
5.1.1.1 Numbered Address	11
5.1.1.2 Unnumbered Address	12
5.1.1.3 Omitted Address	13
5.1.1.4 Community Name	13
5.1.1.5 Degree of Indentation	13
5.2 Instructions Codes in a Listed Address	14

6. Service and Equipment (S & E)	15
6.1 Service and Equipment (S & E)	15
6.2 S & E Subsections	15
6.2.1 Other	15
6.2.2 Chargeable Listings	15
6.2.3 Lines & Stations	16
6.2.4 Calling Card Service	16
6.2.5 Central Office Trunks	16
7. Standard Instructions for USOCs and FIDs	17
7.1 Standard Instructions for USOCs	17
7.2 Standard Instructions for FIDs	17
7.2.1 Fielded FID	17
7.2.2 Left-hand FID	18
7.2.3 Floated FID	18

Introduction

Purpose

The Purpose of this guide is to provide CLECs with instructions on how to interpret the CSR response that is received from BellSouth. This document provides an overview of the various sections that may appear in a CSR. The document also provides detailed instructions on how to interpret the Listed Address portion in the List Section and the Service and Equipment Section. Examples are provided to further illustrate the instructions.

Version Information

Table A Revision History

Chapter	Action Request #	Date/Issue	Description
All	N / A	February 28, 2001 / 1	Initial Issue

1. CSR Job Aid

1.1 Preface

BellSouth is a Regional Bell Operating Company (RBOC) offering local service to residential and business customers in the southeastern United States. Through manual and automated processes, BellSouth offers Competitive Local Exchange Carriers (CLECs) the ability to submit pre-order and order transactions (refer *BellSouth Pre-ordering and Ordering Overview Guide, Issue 1.0*). In response to the pre-order queries, BellSouth transfers, among other data, the Customer Service Record (CSR) corresponding to the account number(s) as requested by the CLEC.

1.2 Audience

This guide is written for the CLEC who submits a CSR query to BellSouth and in return receives a CSR response from BellSouth.

1.3 How to Use These Instructions

An overview of the CSR is provided. The Listed Address portion and Service and Equipment section are covered in detail. Users should read the explanations of the various topics covered in this guide and refer to examples provided that will further illustrate the topics. (To obtain additional information on topics outside the scope of this document, references to other BellSouth documents have been made.)

2. CSR Response from TAG

2.1 CSR Response from TAG

The Telecommunications Access Gateway system (TAG) provides bi-directional flow of information between a CLEC and the BellSouth Operations Support Systems (OSS). TAG returns the CSR response data as a file of continuous text stream wrapped around at end of lines.