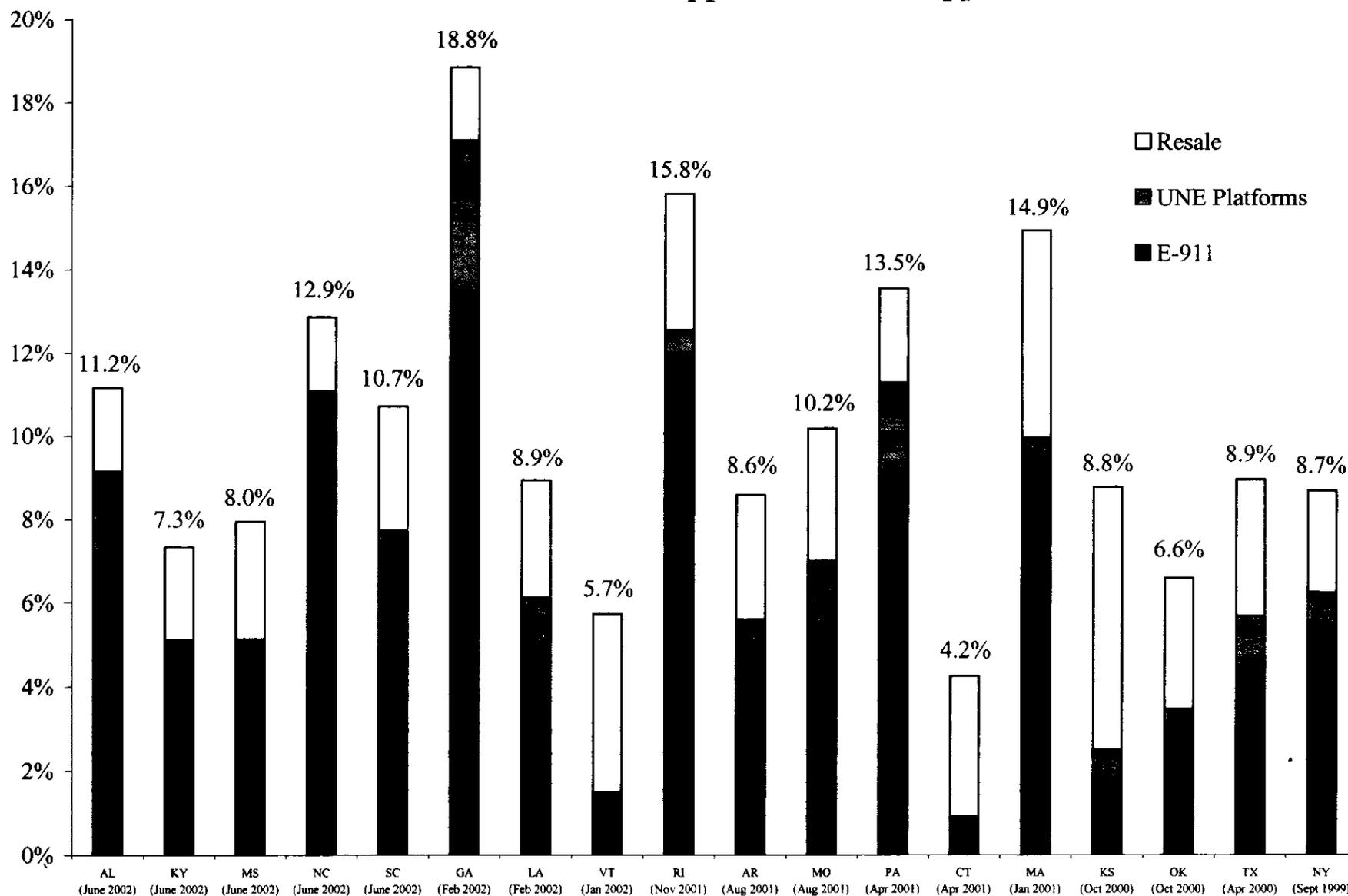


CLEC Market Share at Time of Application: 271 Approved States



Sources: AL: Stockdale Aff., Exh. 12 & 13; KY: Stockdale Aff., Exh. 15 & 16; MS: Stockdale Aff., Exh. 18 & 19; NC: Stockdale Aff., Exh. 21 & 22; SC: Stockdale Aff., Exh. 24 & 25; GA: Stockdale Supp. Aff., Exh. 6 & 9; LA: Stockdale Supp. Aff., Exh. 8 & 10; VT: Brown Decl., Att. A & McCarren/Garzillo/Anglin Decl.; RI: Local Competition in Rhode Island & Brief, Att. A, Exh. 6 & 7; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1 & FCC Order; CT: Taylor Decl., Att. A; MA: Supplemental Brief, Att. A & Initial Taylor Decl., Att. A; KS: Smith-Johnson Aff., Att. A; OK: Smith-Johnson Aff., Att. A; TX: Habeeb Supplemental Aff. & Att. 1; NY: Taylor Decl., Att. A. BOC Access Lines obtained through ARMIS for AR, MO, PA, CT, MA, KS, OK, TX & NY.



REQUIRED STATEMENTS

Pursuant to the Commission's Public Notice, Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (FCC rel. Mar. 23, 2001), BellSouth states as follows:

- (a) pages i-iii of this Brief contain a table of contents;
- (b) pages 1-6 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 20-24 of this Brief contain statements identifying how BellSouth meets the requirements of section 271(c)(1); the tables of contents of Appendices B-AL, B-KY, B-MS, B-NC and B-SC, as well as the Affidavits of Elizabeth Stockdale and John A. Ruscilli/Cynthia K. Cox (and the exhibits thereto), identify the agreements on which BellSouth relies in this joint application; Attachment 4 to this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 6-20 of this Brief contain a statement summarizing the status and findings of the state commission proceedings in these five states examining BellSouth's compliance with section 271;
- (e) this Brief contains the legal and factual arguments outlining how the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 28-137 address the requirements of section 271(d)(3)(A); pages 143-144 address the requirements of section 271(d)(3)(B); and pages 137-143 address the requirements of section 271(d)(3)(C);
- (f) Attachment 5 (separately bound) contain a list of all appendices (including affidavits) and the location of and subjects covered by each of those appendices;
- (g) Inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by BellSouth in this joint application should be addressed to:

Laura S. Brennan
Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C.
Summer Square
1615 M Street, N.W., Suite 400
Washington, D.C. 20036-3209
Telephone: (202) 367-7821

- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002, and certifications signed by officers or duly authorized employees certifying that all information supplied in this joint application is true and accurate to the best of their information and belief are included as Attachment 3 to this Brief.

- (i) The Brief and its supporting affidavits can be found at www.bellsouthcorp.com/policy/271. This website is also identified on page 6 of this Brief.



**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)

Joint Application by BellSouth Corporation,)
BellSouth Telecommunications, Inc., and)
BellSouth Long Distance, Inc. for Provision of)
In-Region, InterLATA Services in Alabama,)
Kentucky, Mississippi, North Carolina and)
South Carolina)

CC Docket No. _____

**DECLARATION AND VERIFICATION OF BELLSOUTH LONG DISTANCE,
INC. AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF BELLSOUTH CORPORATION**

1. I am Harris R. Anthony. I am authorized to make this declaration on behalf of BellSouth Long Distance, Inc.

2. I have reviewed the foregoing Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for provision of In-Region InterLATA Services in Georgia and Louisiana and the materials filed in support thereof.

3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

4. I further certify that BellSouth is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2002.



**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)
)
Joint Application by BellSouth Corporation,)
BellSouth Telecommunications, Inc., and)
BellSouth Long Distance, Inc. for Provision of)
In-Region, InterLATA Services in Alabama,)
Kentucky, Mississippi, North Carolina and)
South Carolina)
)

CC Docket No. _____

**DECLARATION AND VERIFICATION OF BELL SOUTH
TELECOMMUNICATIONS, INC.
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION
OF BELL SOUTH CORPORATION**

1. I am Lisa S. Foshee. I am authorized to make this declaration on behalf of BellSouth Telecommunications, Inc.

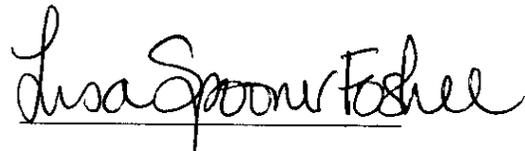
2. I have reviewed the foregoing Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for provision of In-Region InterLATA Services in Georgia and Louisiana and the materials filed in support thereof.

3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.

4. I further certify that BellSouth is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 19, 2002.



Lisa Spooner Foshee

FEDERAL COURT CHALLENGES UNDER 47 U.S.C. § 252(e)(6)

There is no ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the Alabama Public Service Commission.

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the Kentucky Public Service Commission:

BellSouth Telecommunications Inc. v. AT&T Communications of the South Central States, et al., No. 01-70-JMH (E.D. KY)

BellSouth Telecommunications Inc. v. Sprint Communication Company Limited Partnership, et al., No. 2001-79-JMH (E.D. KY)

The following case represents the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the Mississippi Public Service Commission:

AT&T Communications of the South Central States, Inc. v. BellSouth Telecommunications, Inc., et al., No. 01-60777 (5th Cir.)

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the North Carolina Utilities Commission:

MCImetro Access Transmission Services LLC v. BellSouth Telecommunications, Inc., et al., No. 5:01-CV-921-H3 (E.D.N.C.)

MCImetro Access Transmission Services LLC et al. v. Verizon South, Inc. et al., No. 5:02-CV-16-H3 (E.D.N.C.)

The following cases represent the only ongoing litigation under 47 U.S.C. § 252(e)(6) that relates to interconnection agreements and/or Statements of Generally Available Terms and Conditions approved by the South Carolina Public Service Commission:

BellSouth Telecommunications, Inc., v. AT&T Communications of the South Central States, Inc., No. 00-2235 (4th Cir.)

BellSouth Telecommunications, Inc., v. Public Service Commission of South Carolina, et al., No. 3:02-0955-17 (D.S.C.)