

RESPONSE: (Cont.)

Executive Review Board – Kathy Wilson-Chu, Dennis Davis, and Valerie Cottingham, Janet Millers-Field

Third Party Testing Team – Milton McElroy

LCSC Team – Diane Strickland

Project Managers – Suzie Lavett, Audrey Thomas

The BellSouth IT Team – Linda Tate

REQUEST: Bellsouth states in a May 14, 2002 Ex Parte, in FCC Docket No. 02-35, "Assuming no industry release in calendar year 2003, the CLECs could see at least 80% of the existing change request backlog eliminated." Please provide all documentation and analysis that supports that statement, including each change request, by change request number, that BellSouth used in its analysis.

RESPONSE:

BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

To arrive at the 80% figure quoted above, BellSouth analyzed the information that is bulleted below. BellSouth recently provided CLECs with a proprietary projection of capacity for upcoming releases in "UNITs." One UNIT is equal to 100 Release Cycle Hours, as defined in Change Control Process documentation, effective March 15, 2002, Appendix H, entitled "Preliminary Feature Sizing Model."

RESPONSE: (Cont.)

The formula for this analysis is based upon a conversion of the existing CLEC initiated and Regulatory change requests into an estimation of the UNITS of capacity required to implement each change request. BellSouth found:

- 1256 UNITS were estimated to be available in CLEC Production Releases for the reduction of the number of existing Change Requests, assuming no industry release in 2003.
- BellSouth estimated that Type 2 Flow-through change requests would require 998 UNITS of capacity.
- Additionally, BellSouth estimated that Type 5 change requests (CLEC initiated) would require 583 UNITS of capacity.
- $998 \text{ Type 2} + 583 \text{ Type 5} = 1581$ UNITS required to reduce the total estimated change requests, as reflected on the attached spreadsheets.
- $1256/1581 = 79\%$ (BellSouth divided 1256 UNITS (total CLEC production release UNITS under the option that did not include an industry release) by 1581 total UNITS needed to reduce all of the existing estimated change requests, as of May 14, 2002, and arrived at 79%.)

Therefore, BellSouth concluded that approximately 80% of the existing change requests could be reduced in 2003.

Attached are 2 spreadsheets that provide the change request numbers for Type 2 and Type 5 change requests and the required UNITS for each that were utilized in this analysis. The documents were provided to the CLECs via email on May 15, 2002. On May 16, 2002 a meeting was held with the CLECs to question and clarify the 2003 Capacity Planning Estimate and Release Option documents that were mailed. Based on the feedback received from the May 16th meeting, BellSouth updated the 2003 Capacity Release Plan for discussion in the May 22, 2002 Change Review Meeting. Individual Change Requests can be viewed at BellSouth's Interconnection website at:

http://interconnection.bellsouth.com/markets/lec/ccp_live/ccp_cha_req.html

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RESPONSE:

As noted above, BellSouth's analysis was based upon a scenario that assumed no industry release in 2003. However, on June 6, 2002, Change Control emailed the attached ballot tally results to the CLECs indicating that the CLEC community voted in favor of BellSouth's implementation of an industry release in 2003. The CLECs have chosen a scenario, as provided in the May 14, 2002 Ex Parte, that will make less UNITS available to reduce the existing change requests.

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PROPRIETARY

REQUEST: BellSouth states in a May 14, 2002 Ex Parte, in FCC Docket No. 02-35, "Finally, in clarifying the nature of "new" change requests, we explained how requests that BellSouth had rejected remained in that category because the requesting CLEC choose neither to use the dispute resolution process incorporated in the CCP nor to withdraw its request." Please list and produce supporting documentation referred to in this statement, that is, those change requests in the "new" category that have been rejected by BellSouth as of May 14, 2002.

RESPONSE:

BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

Attachment INT 11 is the supporting documentation requested above with the "new" change requests (CRs) and their history of responses, revisits, and/or appeals. Those CRs with an asterisk beside them will be canceled by CMT if the CLEC does not reply to the last response sent.

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REQUEST: On April 26, 2002, BellSouth published Change Request CR0756, entitled "UNE-P Call Scope Changes" labeling it as a Type-2, "Regulatory Mandate". The User Requirements Document (ENC21046.DOC Version 6.0) describes the Current Process as follows "Currently, when converting Retail/Resale to UNE-P, the correct LNECLSSVC is not always populated on the conversion.", and the Expected Process as follows "With implementation of this feature, conversions from Retail/Resale line to UNE-P will result in the correct LNECLSSCV being populated." Please explain BellSouth's classification of this defect as a regulatory mandate and provide the specific regulatory order(s) that addresses the incorrect conversion of lines from Retail/Resale to UNE-P that are the subject of this change request for TN and all other BellSouth states.

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

CR0756 is classified as a Type 2 because this change was initiated as a result of a Mississippi order, *Order# 2000-AD-413 Dated 9/19/2000*. CLECs will be able to convert BellSouth retail or resale services affected by the MS Desoto County Expanded Local Calling Order to comparable UNE-P services with expanded local calling.

(continued)

Other modifications were included in CR0756 because they all require an update to the same LESOG table and would provide the following improvements:

- Additional Non-Caller ID UNE port USOCs to more completely and clearly delineate between USOCs to be used with Caller ID and those that will not support Caller ID
- New UNE Port USOCs that may be used to distinguish between the measured and flat-rate basic 10 digit dialing scope when converting BellSouth retail or resale lines in Georgia to UNE ports.
- New UNE Port USOCs supporting conversions from BellSouth's retail's Area Plus Service in Florida with CREX7.

Updating the LESOG table for all these modifications at the same time is a more efficient way to manage changes.

The above modifications are not defects because this functionality currently does not exist nor does this change meet the defect criteria as documented in the Change Control Process document. A defect, as defined in the Change Control Process document is a "change that corrects problems discovered in production versions of an application interface. These problems are where the interface is not working in accordance to the BellSouth baseline user requirements or the business rules that BellSouth has published or otherwise provided to the CLECs. In addition, if functional requirements agreed upon by BellSouth and the CLECs, results in inoperable functionality, even though software user requirements and business rules match, this will be addressed as a defect."

REQUEST: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's retail operations, wholesale operations, or both. The work centers and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center (d) regional central office operations; (e) regional installation and maintenance operations; (f) regional engineering and construction operations; (g) work management centers; (h) network reliability center; (i) address/facility inventory group (j) circuit provisioning group (k) customer wholesale interconnection services (CWINS) center; (l) billing data centers (m) Access Customer Advocacy Center (ACAC); (n) Interexchange Carrier Service Center (ICSC); (o) Local Interconnection Service Center (LISC).

RESPONSE: See attached.

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REQUEST: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

RESPONSE: See BellSouth's response to 1st Data Request, Item No. 13.

REQUEST: Please identify all modifications to BellSouth's systems, processes, and procedures necessary to collect and present data in reports that will comply with the permanent set of performance measurements adopted by the Tennessee regulatory Authority in Docket No. 01-00193 and

- (a) provide a detailed schedule for completing each modification listed;
- (b) describe the recourses necessary to complete each modification listed;
an
- (c) if any listed modifications cannot be completed within 30 days, please state the reason(s) for the delay in completing that modification.

RESPONSE:

Please refer to BellSouth's Motion for Reconsideration filed in Docket No. 01-00193 on May 29, 2002, provided in Request for Documents, Item No. 1. BellSouth is still in the process of developing the requirements for the changes ordered by the TRA as described in paragraph III of the Motion.

REQUEST: Provide a complete description of each Performance Metrics defect correction and feature enhancement scheduled for implementation in Test Director, Team Connection or other Performance Metrics tracking systems.

RESPONSE: Please refer to BellSouth's response to Item No. 17

REQUEST: Provide a complete description of each Performance Metrics defect correction and feature enhancement implemented from October 2001 to the present and tracked in Test Director, Team Connection or other Performance Metrics tracking system.

RESPONSE: Please see documents provided in BellSouth's response to Request for Documents, Item No. 1 for the Performance Metrics defect correction and feature enhancement implemented from October 2001 to the present and tracked in Test Director.

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REQUEST: Provide BellSouth tracking or other issues logs for open issues, observations and exceptions in the current performance metrics audit in Georgia.

RESPONSE: Please see BellSouth's response to Request for Documents, Item No. 1 for documents responsive to this request. This information is proprietary and is being provided subject to the execution of an appropriate non-disclosure agreement.

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REQUEST: Provide BellSouth's Network Services Dispatch Priority List associated with maintenance activities. This list should detail how BellSouth prioritizes all CLEC trouble tickets.

RESPONSE: See BellSouth's response to 1st Data Request, Item No. 55.

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REQUEST: Provide the date by which completion notices for orders completed in one month, but notice provided in another will be added to the Average Completion Notice Interval Measure.

RESPONSE: This issue is expected to be implemented with July 2002 data.

REQUEST: Provide the date by which completion notices for orders classified, as “projects” will be added to the Average Completion Notice Interval Measure.

RESPONSE: Orders classified as projects are not excluded from any Provisioning measure, however, because Projects are excluded in Ordering, these orders may not have been previously included in the ACNI measure. To determine if the LSR was received by mechanized or non-mechanized methods, the completion notice has to be matched to the original LSR that only appears in the ordering measures. Some LSRs, including projects, are legitimately excluded from the ordering measures but are included in provisioning measures. Completion notices for these LSRs could not be matched to the LSR so they were excluded. However, LSRs excluded from ordering raw data are placed in an "error" file, so BellSouth will begin looking in this error file to match LSRs to completion notices. This enhancement, effective with January data, added additional SOs to the ACNI volume; however, it should not have a disproportionate impact on the reported interval.

REQUEST: Provide the date by which BellSouth will report performance for the Average Jeopardy Notice Interval Measure in compliance with its published business rules which require that BellSouth measure from the date and time the notice is released to the CLEC until 5pm on the commitment date of the order.

RESPONSE: BellSouth currently report the Average Jeopardy Notice Interval (AJNI) measure as part of the Average Jeopardy Notice Interval & Percentage of Orders Given Jeopardy Notice measure. BellSouth currently reports the Average Jeopardy Notice Interval Measure in compliance with its published business rules which require that BellSouth measure from the date and time the notice is released to the CLEC until 5pm on the commitment date of the order.

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REQUEST: Provide BellSouth's sampling methodology for the % Database Update Accuracy Measure.

RESPONSE: Please see the attached document Item24.doc, which contains BellSouth's sampling methodology for the Percent Database Update Accuracy Measure. The Percent Database Update Accuracy measurement is done using service orders from this sample.

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REQUEST: Describe in which performance measures BellSouth reports its rejection and FOC performance for each type of LSR submitted to the Complex Resale Support Group (CRSG).

RESPONSE: LSRs submitted to the CRSG and included in Performance Measurements results are currently reported in BellSouth's SQM in the Non-Mechanized categories for Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness, and Firm Order Confirmation and Reject Response Completeness under the following products:

Resale Design (Specials)
UNE Loop + Port Combinations
xDSL
Local Interoffice Transport

Additionally xDSL and Local Interoffice Transport are reported in BellSouth's SQM in Service Inquiry with LSR Firm Order Confirmation Response Time - Manual.

REQUEST: Please provide BellSouth's rejection and FOC performance for LSRs processed by the Complex Resale Support Group (CRSG) for Tennessee for the months of January-April, 2002.

RESPONSE: BellSouth does not have this LSR data processed separately, by Service Centers, as BellSouth Performance Measures do not include the CRSG as a defined level of disaggregation. LSRs processed by the CRSG and reported in monthly results for Reject Interval and FOC Timeliness are included in Resale Design (Special), UNE Loop + Port Combinations, xDSL, and Local Interoffice Transport. They are classified as non-mechanized LSRs.

However, in order to make an effort to respond, BellSouth has provided the rejection and FOC performance for these LSRs.

Service inquires processed by the CRSG and reported in monthly results are included in Resale Design (Special), UNE Loop + Port Combinations, xDSL, and Local Interoffice Transport. However less than 2.5% of the reported UNE Loop + Port Combinations received in January through March are LSRs processed by the CRSG.

BellSouth's rejection and FOC performance for LSRs for these categories includes the LSRs processed by the Complex Resale Support Group (CRSG) for Tennessee for the months of January-April, 2002 is as follows:

Reject Interval - Non-Mechanized
Resale Design (Specials)/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	100.00%	3	3
Feb-02	85.00%	100.00%	8	8
Mar-02	85.00%	93.33%	28	30
Apr-02	85.00%	100.00%	41	41

Reject Interval - Non-Mechanized
 UNE Loop + Port Combinations/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	96.47%	82	85
Feb-02	85.00%	98.97%	96	97
Mar-02	85.00%	97.37%	111	114
Apr-02	85.00%	98.65%	73	74

Reject Interval - Non-Mechanized
 xDSL (ADSL, HDSL and UCL)/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	100.00%	12	12
Feb-02	85.00%	97.73%	43	44
Mar-02	85.00%	100.00%	32	32
Apr-02	85.00%	100.00%	17	17

Reject Interval - Non-Mechanized
 Local Interoffice Transport/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	100.00%	1	1
Feb-02	85.00%	100.00%	4	4
Mar-02	85.00%	100.00%	40	40
Apr-02	85.00%	100.00%	11	11

FOC Timeliness - Non-Mechanized
 Resale Design (Specials)/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	94.74%	18	19
Feb-02	85.00%	100.00%	8	8
Mar-02	85.00%	92.86%	26	28
Apr-02	85.00%	100.00%	79	79

FOC Timeliness - Non-Mechanized
 UNE Loop + Port Combinations/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	98.73%	78	79
Feb-02	85.00%	96.00%	72	75
Mar-02	85.00%	98.88%	88	89
Apr-02	85.00%	97.54%	119	122

FOC Timeliness - Non-Mechanized
 xDSL (ADSL, HDSL and UCL)/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	100.00%	78	78
Feb-02	85.00%	100.00%	145	145
Mar-02	85.00%	100.00%	95	95
Apr-02	85.00%	100.00%	48	48

FOC Timeliness - Non-Mechanized
 Local Interoffice Transport/TN (%)

	Benchmark	CLEC	Numerator	Volume
Jan-02	85.00%	100.00%	1	1
Feb-02	85.00%			
Mar-02	85.00%	100.00%	41	41
Apr-02	85.00%	100.00%	13	13

REQUEST: Describe why BellSouth populates the equity column in its (Monthly State Summary (MSS) performance reports with "Yes" for the Mean Held Orders Interval Measure even though there are no CLEC held orders.

RESPONSE: BellSouth populates the equity column in its Monthly State Summary (MSS) performance reports with "Yes" for the Mean Held Orders Interval Measure because BellSouth had no held orders for the report period. Therefore, BellSouth achieved the performance standard for the measurement and populated a "Yes" in the equity column in the MSS report.

REQUEST: Does BellSouth exclude outages of less than 20 minutes from the Interface Availability Measure? If yes, provide, by month and by interface, for the months of January-April 2002, the number of outages of less than 20 minutes.

RESPONSE: BellSouth does not exclude outages of less than 20 minutes. One minute is the lowest unit of measure for outages. If an outage is less than a minute, the outage will be measured as a one-minute outage.

REQUEST: Describe any differences in the data included in the LSRs in the denominator of the % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the flow-through report.

RESPONSE: Flow-Through "Total Mech LSRs" includes projects, PMAP % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs with negative FOC or reject intervals, % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs where a product code could not be identified, PMAP % Rejected LSRs does not.

Flow-Through "Total Mech LSRs" includes LSRs for which a state was not identified, % Rejected LSRs does not.

REQUEST: Describe any differences in the data included in the LSRs in the denominator of the LNP % Rejected LSRs measure (Total Mechanized) and the number of LSRs included in the "Total Mech LSRs" in the LNP flow-through report.

RESPONSE: LNP Flow-Through 'Total Mech LSRs' includes all LSRs that meet the following conditions:

- 1.) Received by the LNP Gateway in the reporting month
- 2.) Received a Clarification or FOC by the time the snapshot of the data is taken.

LNP % Rejected LSRs includes LSRs received by TAG or EDI gateways in the reporting month.

LNP Flow-Through 'Total Mech LSRs' includes LSRs with negative intervals, LNP % Rejected LSRs excludes LSRs with negative intervals.

LNP Flow-Through 'Total Mech LSRs' includes LSRs with a SUP of 01 (cancel). LNP % Rejected LSRs excludes LSRs with a SUP of 01.

LNP Flow-Through 'Total Mech LSRs' includes projects, LNP % Rejected LSRs excludes projects.

REQUEST: Describe any differences in the data included in the LSRs in the fully mechanized Reject Interval measure and the LSRs in the auto-clarifications of the flow-through report.

RESPONSE: Flow-Through Auto-clarifications includes projects, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs with negative reject intervals, fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs for which a product code could not be identified, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs that were auto-clarified in error and then corrected by a service representative, PMAP fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications does not include any LSRs that were clarified by a service representative, PMAP fully mechanized Reject Interval includes LSRs that were clarified by a service representative, but were not properly assigned to a specific service representative.

Flow-Through Auto-clarifications does not include any LSRs that went to planned manual fallout, PMAP fully mechanized Reject Interval includes LSRs that went to planned manual fallout and were clarified by a service representative, but were not properly assigned to a specific service representative.

Flow-Through Auto-clarifications excludes LSRs received in previous months, fully mechanized Reject Interval does not.

Flow-Through Auto-clarifications includes LSRs for which a state could not be identified, fully mechanized Reject Interval does not.

REQUEST: Describe any differences in the data included in the LSRs in the fully mechanized LNP Reject Interval measure and the LSRs in the auto-clarifications of the LNP flow-through report.

RESPONSE: LNP Flow-Through Auto-clarifications excludes LSRs received in previous months. Fully mechanized LNP Reject Interval includes LSRs received in previous months and rejected in the current month.

LNP Flow-Through Auto-clarifications include LSRs with negative intervals. Fully mechanized LNP Reject Interval excludes LSRs with negative intervals.

LNP Flow-Through Auto-clarifications includes LSRs with a SUP of 01 (cancel). Fully mechanized LNP Reject Interval excludes LSRs with a SUP of 01.

LNP Flow-Through Auto-clarifications includes projects. Fully mechanized LNP Reject Interval excludes projects.

LNP Flow-Through Auto-clarifications counts LSRs which meet the following criteria from tables in the LNP Gateway: tranacktype = AH, errorlevel = AUTO and errorsource = A. Fully mechanized LNP Reject Interval counts LSRs which meet the following criteria from EDI or TAG logs: tran_set_pur_cd = 'CLARIFICATION' and cuid = unassign. These differences in logic have resulted in the following differences in the counts of LSRs:

- 1.) LNP Flow-Through Auto-clarifications contains some LSRs which may have been clarified by a Service Representative.
- 2.) LNP Flow-Through Auto-clarifications contains some LSRs that fell for Planned Manual handling.

These issues will not impact the reported Percent Flow-Through results.

REQUEST: Describe any differences in the data included in the LSRs in the partially mechanized Reject Interval measure and the LSRs included in the "CLEC caused fallout" of the flow-through report.

RESPONSE: Flow-Through "CLEC-Caused fallout" includes projects, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs with negative reject intervals, Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs for which a product code could not be identified, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs that are dropped to the LCSC via the "TSIGNOUT" queue, PMAP Reject Interval also includes TSIGNOUT LSRs, but only those that are assigned to a specific service representative.

Flow-Through "CLEC-Caused fallout" excludes LSRs that were auto-clarified, Reject Interval includes LSRs that are auto-clarified if they are subsequently routed to a service representative for handling.

Flow-Through "CLEC-Caused fallout" excludes LSRs that went to planned manual fallout, PMAP Reject Interval does not.

Flow-Through "CLEC-Caused fallout" excludes LSRs received in previous months, Reject Interval does not.

Flow-Through "CLEC-Caused fallout" includes LSRs for which a state could not be identified, Reject Interval does not.

REQUEST: Describe any differences in the data included in the LSRs in the partially mechanized LNP Reject Interval measure and the LSRs included in the "CLEC caused fallout" of the LNP flow-through report.

RESPONSE: LNP CLEC-Caused Fallout excludes LSRs received in previous months. Partially mechanized LNP Reject Interval includes LSRs received in previous months.

LNP CLEC-Caused Fallout includes LSRs with negative intervals. Partially mechanized LNP Reject Interval excludes LSRs with negative intervals.

LNP CLEC-Caused Fallout includes LSRs with a SUP of 01 (cancel). Partially mechanized LNP Reject Interval excludes LSRs with a SUP of 01.

LNP CLEC-Caused Fallout includes projects. Partially mechanized LNP Reject Interval excludes projects.

LNP CLEC-Caused Fallout excludes LSRs that fell out for Planned Manual handling. Partially mechanized LNP Reject Interval includes LSRs that fell out for Planned Manual handling.

LNP CLEC-Caused Fallout includes LSRs where the tranacktype = AH and the LSR was not assigned to Auto-clarifications or Planned Manual. Partially mechanized LNP Reject Interval includes LSRs that were clarified in the EDI/TAG gateway and the cuid <> unassign. The tranacktype does not have to be AH.

This difference in logic can cause the following difference in LSR counts:

1.) If an LSR gets both a clarification and a FOC (the LSR is clarified in error and the Service Representative fixes it), the LNP Gateway keeps only the last response type which is the FOC, and the cuid will not be "unassign", so the LSR will not be counted in CLEC Caused fallout, but in BellSouth Caused fallout. The LSR will be counted in Partially mechanized LNP Reject Interval because it gets the clarification indicator from the EDI / TAG gateway which keeps all responses.

REQUEST: Describe any differences in the data included in the LSRs in the fully mechanized FOC timeliness measure and the LSRs included in the "Issued Service Orders" of the flow-through report.

RESPONSE: Flow-Through "Issued Service Orders" includes projects, PMAP fully mechanized FOC Timeliness does not.
Flow-Through "Issued Service Orders" includes LSRs with negative FOC intervals, fully mechanized FOC Timeliness does not.
Flow-Through "Issued Service Orders" includes LSRs for which a product code could not be identified, PMAP fully mechanized FOC Timeliness does not.

Flow-Through "Issued Service Orders" includes LSRs that were FOC'd and the service order number is properly recorded in LEO. PMAP fully mechanized FOC Timeliness includes all LSRs that were FOC'd whether or not the service order number is properly recorded in LEO.

Flow-Through "Issued Service Orders" includes LSRs that were "Dummy FOC'd" ('%DUMMY FOC SENT%'), while PMAP fully mechanized FOC Timeliness includes slightly fewer LSRs that were "Dummy FOC'd" ('%DUMMY FOC SENT').

Flow-Through "Issued Service Orders" excludes FOC'd LSRs that drop to the LCSC via the "TSIGNOUT" queue as well as LSRs classified as "Planned Manual Fallout" via the SQM. PMAP fully mechanized FOC Timeliness includes those FOC'd TSIGNOUT and "Planned Manual Fallout" LSRs that are not assigned to a specific service representative.

Flow-Through "Issued Service Orders" excludes LSRs received in previous months, PMAP fully mechanized FOC Timeliness does not.

Flow-Through "Issued Service Orders" includes LSRs for which a state was not identified, fully mechanized FOC Timeliness does not.

REQUEST: Describe any differences in the data included in the LSRs in the fully mechanized LNP FOC timeliness measure and the LSRs included in the "Issued Service Orders" of the LNP flow-through report.

RESPONSE: LNP "Issued Service Orders" excludes LSRs received in previous months. Fully mechanized LNP FOC Timeliness includes LSRs received in previous months and FOC'd in the current month.

LNP "Issued Service Orders" includes LSRs with negative intervals. Fully mechanized LNP FOC Timeliness excludes LSRs with negative intervals.

LNP "Issued Service Orders" includes LSRs with a SUP of 01 (cancel). Fully mechanized LNP FOC Timeliness excludes LSRs with a SUP of 01.

LNP "Issued Service Orders" includes projects. Fully mechanized LNP FOC Timeliness excludes projects.

LNP "Issued Service Orders" includes LSRs that were not classified as Auto-clarification or Planned Manual, and met one of the following conditions:

1.) REQTYPE = CB

- a. FOC was transmitted in response to LSR
- b. The trigger service order associated with the LSR was generated mechanically.

2.) REQTYPE = BB

- a. FOC was transmitted in response to LSR
- b. All service orders associated with the LSR were generated mechanically.

3.) CUID = unassign

Fully mechanized LNP FOC Timeliness includes LSRs where cuid = unassign and either:

- 1.) Tranacktype <> RD and there is no EDI / TAG gateway timestamp
- 2.) FOC was sent at the EDI / TAG gateway.

These differences in logic can result in the following differences in LSR counts:

- 1.) If the disconnect order for a REQTYPE CB LSR was generated manually, the LSR would be counted in LNP Flow-Through Issued SOs, but not in the Fully mechanized FOC Timeliness measure.
- 2.) If the Tranacktype value was AH, indicating a clarification, and there was not an inbound timestamp or a outbound FOC timestamp in the EDI / TAG gateway, the LSR would be counted as both a fully mechanized reject and a fully mechanized FOC.

REQUEST: Describe any differences in the completed orders used in the calculation of the missed appointments measure and the completed orders used in the denominator of the Average Completion Notice Interval Measure.

RESPONSE: The Percent Missed Appointment utilizes the completion interval for the denominator (All completed orders within the reporting period). Average Completion Notice Interval utilizes the completion notice interval for the denominator (All completed orders which receive a notice within the reporting period).

REQUEST: Describe BellSouth's policy on providing raw data for LSRs that are documented exclusions from performance measures. For example, LSRs classified as "projects" are documented exclusions from the Reject Interval and FOC Timeliness measures. BellSouth currently refuses to provide raw data for these "project" LSRs.

RESPONSE: BellSouth provides all the SQM Report Supporting Data used to calculate the results in each measure. Some data listed as an exclusion is currently "excluded" before the files are built for the calculation of the report. This is done to limit the size of the supporting data "raw data" files and to make the report run more efficiently. Actually the data is not "excluded" by the code, most of these items are not selected by the code for inclusion in the report. For instance a report statement might say "Select all N, T and C orders with a completion date during the report period". That would mean canceled orders would not be selected from the database for inclusion in the file used to calculate the report because it would not have a completion date.

However, based on requests from some CLECs who have the capability to manipulate exceedingly large files, BellSouth is developing the capability to produce supporting data files that include all data used in the report or excluded from the report by the SQMP that exists in the PMAP Warehouse. BellSouth will furnish to a requesting CLEC three months each year the SQMP Supporting Data Files and files with the data listed in the Exclusion Section of that state's SQMP. This will include "projects" which are large complex requests and are assigned to project managers by the CLEC and BellSouth who negotiate FOC and provisioning intervals. Projects are excluded from the Ordering Measures but are included in the Provisioning Measures.

REQUEST: Describe any differences in the data included in the LSRs in the denominator of the Acknowledgment Message Completeness measure and the number of LSRs included in the "Total Mech LSRs" in the Flow Through Report and LNP Flow Through Report.

RESPONSE: EDI returns one acknowledgment for each 'group' of LSRs within an Envelope. Flow-Through and LNP Flow-Through 'Total Mech LSRs' counts each individual LSR, Acknowledgment Message Completeness counts the one acknowledgment.

Neither Flow-Through nor LNP Flow-Through 'Total Mech LSRs' includes Fatal Rejects. Acknowledgment Message Completeness includes Fatal Rejects.

LNP 'Total Mech LSRs' only includes those LSRs which received a FOC or reject response in the reporting month. Acknowledgment Message Completeness includes those LSRs that did not necessarily receive a FOC or reject response in the reporting month.

Some LSRs are fatally rejected by TAG before they get to LEO. Those LSRs are not included in the Flow-Through or LNP Flow-Through 'Total Mech LSRs', but they are included in Acknowledgment Message Completeness.

REQUEST: Does BellSouth have internal criteria that it uses to evaluate the performance of the CLEC Care Organization, both individually and collectively? If so, please specify such criteria in detail.

RESPONSE: All individuals have quarterly and annual commitments used to evaluate individual performance. These commitments vary from employee to employee based on job title, and or job grade. Basically these individual commitments are no different than other BellSouth organizations.

REQUEST: How does BellSouth structure its compensation plan for CLEC Care Associates?

RESPONSE: Compensation of CLEC Care team members are based on the following:
Overall leverage: 85% base salary / 15% variable

The variable piece is allocated as follows:

ICS Revenue: 25%

Individual Strategic Objectives: 52.5%

Customer Satisfaction: 7.5%

Discretionary (can be added to group revenue or Strategic): 15%

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REQUEST: In what areas of expertise are CLEC Care Organization Associates trained?
Please provide a detailed description.

RESPONSE: There is a 2-year "certification" training program that CLEC Care employees
are currently undertaking.

REQUEST: From January 2002 to April 2002, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the achieved flow through rate and the CLEC error excluded flow through rate, by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a) LNP;
- b) UNE;
- c) Business Resale;
- d) Residence Resale; and
- e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: Provided in the attached files are the achieved flow through rates and CLEC error excluded flow through rates for each individual state in BellSouth's region and for the BellSouth region in total by interface (EDI, LENS, TAG) for LNP, UNE, Business Resale, Residence Resale and Aggregate from January 2002 through April 2002.

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REQUEST: From January 2002 to April 2002, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the volume of LSRs (segregated by manual and electronic) and the volume of issued service orders by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories:

- a. LNP;
- b. UNE;
- c. Business Resale;
- d. Residence Resale; and
- e. Total (i.e., UNE, Business Resale, and Residential Resale combined)

RESPONSE: Please find attached BellSouth's aggregate volume for LSRs submitted manually from January 2002 to April 2002. The aggregate volumes include the following categories: LNP, UNE, Business Resale, and Residence Resale. Also included are the service order volumes for the respective categories.

State level details are currently being developed and a supplemental response will be provided as soon as possible.

Please see response to Data Request No. 43 for the volume of LSRs submitted electronically and the volume of issued service orders as requested.

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REQUEST: For each month since January 2002 to April 2002, please provide BellSouth's monthly wholesale revenues (or billings) for each state in its nine state region (and its regional total) in each of the following areas: residential resale, business resale, unbundled network elements, and interconnection. Also, please describe BellSouth's understanding of the reasons causing any significant change (i.e., 15 percent or greater) in Tennessee from one month to another (e.g., January 2002 to February, 2002) in any area.

RESPONSE: Please see the attached spreadsheets.

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REQUEST: Please describe BellSouth's current plans to replace existing OSS with different OSS solutions, including but not limited to the anticipated technology to be used, functionality, and implementation schedule.

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

The following describes BellSouth's current plans to replace existing OSS.

BellSouth Inside Ticket Transfer System (BITTS). The FOMS interface will replace the current terminal emulation that is being performed by BellSouth Inside Ticket Transfer System (BITTS), thereby allowing retirement of the BITTS hardware and associated processing. The Integrated Dispatch System/Force(IDS) project will replace the dispatch function of the LMOS/FE/Mapper and consolidates all dispatch functions into one system. In the process it retires BITTS possibly in 2003.

COSMOS - SWITCH replaced the inventory and assignment functions of COSMOS and FOMS replaced the mainframe work management functions of COSMOS. COSMOS was completed in 2002.

Direct Order Entry (DOE) and Service Order Negotiation System (SONGS) - Retail centers are scheduled to eliminate reliance on systems in 2003. Wholesale/Interconnection plans for elimination of reliance on DOE and SONGS is scheduled within the WITT project—approximated as late as 2004 or after. Network centers will be migrated after the 2004 date. Although the Appointment Control System (ACS) initiative is currently on hold, completion of the initiative would retire Direct Order Entry (DOE).

Direct Order Entry (DOE) Support Application (DSAP) & Dispatch System Enhancements (DSE) - The BellSouth Appointment Control System (ACS) will provide appointments and reservation numbers for Service Activation and Service Assurance dispatchable tasks. The ACS System will be a component of Integrated Dispatch System (IDS) already implemented. Replacement with ACS is anticipated sometime in the future. Although the Appointment Control System (ACS) initiative is currently on hold, completion of the initiative would retire Direct Order Entry (DOE) Support Application (DSAP). Since ticket status will still be provided to the Business Office via the Dispatch System Enhancements (DSE) tool, ACS will not retire DSE.

- A. **Integrated Test System (ITS)** - Special service circuit testing is currently provided through Telcordia's Integrated Test system (ITS) and is deployed throughout the BellSouth Region. The ITS system provides users with full integration to Remote Test Units and other OS systems needed to perform special service circuit testing. Telcordia's Integrated Testing and Analysis System (INTAS) product will replace the legacy Integrated Test System (ITS) to provide remote testing for special services. INTAS was purchased as an off the shelf product that would retain the existing functionality found in ITS. INTAS project is still pending.

B.

Loop Maintenance Operating System (LMOS Mapper) - The Integrated Dispatch System (IDS) initiative replaces the dispatch functionality of the "Mapper" component in the Loop Maintenance Operating System (LMOS). However, since the Automatic Correlation (ACORR) functionality will continue until the LMOS Replacement Project (LRP) initiative replaces it, there are no LMOS/Mapper retirements associated with the IDS initiative. LMOS/Mapper replacement is still pending.

Network Fault Management (NFM) -

In 2001, Telcordia's NMA Switch software was installed, and the migration process began. NMA will provide a single view of the entire Narrowband network and position BellSouth for full Broadband monitoring and surveillance. Full migration to NMA and de-installation of NFM are still pending.

Work Force Administration – Dispatch In & Out (WFA-DI & DO) - The Special Services conversion from Work Force Administration – Dispatch Out (WFA-DO) to IDS is scheduled to begin 2003. Upon completion of the Specials conversion, WFA-DO will be retired. IDS interface will be activated as part of the Work Force Administration – Dispatch In (WFA-DI) replacement. The IDS conversion for the Network Infrastructure Systems Center (NISC) and WFA-DI is currently scheduled to complete by year-end 2003. Upon successful conversion, the WFA-DI hardware will be retired.

RSAG - replacement is planned in a 3 to 5 year timeframe via ALOC, which is a Telcordia application of which there is no additional information at this time.

Signaling Traffic Management Operations System (STMOS)

It is proposed that Signaling Traffic Management Operations System (STMOS) be retired. An evaluation of STMOS concluded that the system could be retired with minimal risk to service objectives and achievement of significant expense reduction. CCS7 alarms would continue to be monitored through a Telcordia Network Monitoring and Analysis (NMA) system feed in both the NMC and NRC.

BellSouth will migrate the current wholesale functionality from the Encore Platform to the desired state of Architecture, which has been defined as the Integrated Digital Network (IDN) Solution. In an effort to achieve the desired state for the wholesale Service Management Layer (SML), this project will provide for the migration of the Encore platform to the IDN solution over the next 24 - 36 months

1.

Architecture

- Move the wholesale architecture to the BellSouth desired method of operation (DMO) as quickly as possible making sure that functionality is not lost and all new products moved to the IDN platform have flow through with scalability to retail volumes.
- Develop DMO plans consistent with the BellSouth standards.

II. GUIDING PRINCIPLES

1. Current functionality cannot be lost when transitioning to the IDN solution
2. Functional gaps critical to the migration for support functionality & products onto the IDN
3. All products placed on the IDN platform will be mechanized.
4. Migrate all targeted products off Encore to IDN in 24-36 months.
5. CLEC impact will be minimized
6. Disruptions to the Local Carrier Service Center (LCSC) operations will be controlled & minimized
7. Adhere to all current Encore & IDN release procedures & baselined milestones.
8. Four categories will be prioritized by the Business Unit utilizing the current Change Management Process
 - Network and Carrier Services Priority List
 - Change Management Request
 - Mandates
 - Non-mechanized & Partially mechanized

The following components will be replaced during the migration from Encore to the IDN desired state solution:

- Telecommunications Access Gateway (TAG) including the Based Line Products (BLP)
- Local Service Request Router (LSRR)
- Local Exchange Ordering system (LEO/LEO) Online
- Local Exchange Service Order Generator (LESOG)
- Provisioning Analysts Workstation (PAWS) – the functionality used by the LCSC will be removed from PAWS
- CLEC Service Order Tracking System (CSOTS)
- Direct Order Entry Service/Order Negotiation System (DOE/SONGS) – replacement for wholesale order entry
- Local Order Number (LON)

The following new components will be added to the IDN desired state solution:

- Work Item Manager (WIM) - will replace PAWS for LCSC functionality only. WIM will also replace some of the functionality currently provided by LEO Online.
- Complex Message Generator (CMG) - will support
9. **PRE** – Programmable Rules Engine (PRE), PAR, Service Order Generator (SOG) and Due Date Calculator (DDC) functionality.
- Request Database
 - Service Order Editor
 - Notification Editor
 - Enterprise Foundation Components

The following components currently exist and will remain after the migration is complete:

- CBS/EFC – Common Business Services/Enterprise Foundation Components in the Message Broker Data Bus.
- Local Exchange Navigation System LENS – LENS will be modified to support the new platform and to address the dependencies in LEO.
- Legacy Systems (Customer Record Information System CRIS, Application for Telephone Number Load Administration and Selection ATLAS, Product/Services Inventory Management System PIMS, Distributed Support Application DSAP, Regional Street Address Guide RSAG)
- Service Gate Gateway SGG
- Delivery Order Manager (DOM)
- DOE/SONGS – (will be replaced for wholesale)
- Performance Measure and Analysis Platform PMAP Reports

REQUEST: Identify the OSS performance measures that relate to: (a) testing of advanced services; and (b) the resale of advance services.

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

BellSouth does not have any "OSS Performance Measures" that "relate to the testing of advance services". The BellSouth's Performance Measures described in its Service Quality Measurement Plan (SQM) captures all the activities associated with the pro-ordering, ordering, provisioning which may include testing of a service or loop if required, maintenance and billing of all services requested by a CLEC including "Advanced Services".

REQUEST: Please describe in detail the process BellSouth uses to migrate a customer from BellSouth to a CLEC when the CLEC requests the migration "as specified" in an order for UNE-P service. Please include in your description of an explanation of all internal BellSouth orders (such as "D" orders and "N" orders or the single "C" order) used to facilitate the migration and the provisioning systems those orders flow through.

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

For a manually submitted Local Service Requests (LSRs) received by BellSouth's LCSC error free, the representative enters the request into DOE/SONGS. CLECs may also electronically submit Retail to UNE-P conversion LSRs "as specified". These electronic requests may be submitted via BellSouth's Local Exchange Navigation System ("LENS"), Electronic Data Interchange ("EDI"), Telecommunications Access Gateway ("TAG").

Certain USOCs used to provide BellSouth Retail and Resale services are not transferable or applicable to a UNE account. Those USOCs will be deleted from the "C" order that is generated for the UNE-P account. Other USOCs and services that are also not applicable for conversion to UNE-P, if ordered will result in a clarification back to the CLEC. A list of these USOCs and services can be found in the "2 wire Voice Grade UNE Loop/Port Switched Combinations (Business, Residence, and Line Side PBX" at: www.interconnection.bellsouth.com/products/html/unes.html

(Continued)

Upon receipt of a complete and correct LSR from the CLEC, the ordering process will proceed. A "C" order is issued to disconnect the Retail service from a BellSouth account. and change the basic class of service from flat-rate to measured and establishes UNE-P service for the CLEC.

The order then flows to the Loop Facility Assignment System (LFACS) to validate the facility information. The orders then flow to the BellSouth SWITCH, where the line class code is changed from "flat rate" to "measured" and the order flows to the BellSouth switch for a

translation change on the due date. The order completes on the due date and flows to the Customer Record Information System (CRIS) for billing local usage.

Business rules for ordering UNE-Ps electronically/manually are located on the BellSouth Interconnection Web Site, BellSouth Business Rules for Local Ordering, Section 10.2.

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

This process becomes effective when Single C functionality is implemented for Tennessee on August 4, 2002. See BellSouth's previous response to Tennessee Regulatory Authority, Docket No. 01-000362, AT&T, SECCA, WorldCom, Time Warner, XO & Covad's, 1st Interrogatories, August 21, 2001, Item 42.

REQUEST: If an electronic UNE-P migration LSR as specified falls out for manual processing, does the BellSouth service representative use the service address provided on the CLEC LSR to create the "D" and the "N" order or the "single C" order? If not, from what database or system does the representative obtain the service address for the "D" order, for the "N" order or for the single "C" order?

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

Unless the CLEC specifies that the end user is moving, the service representative uses the existing address on the Customer Service Record (CSR). If validation of the address should be required, RSAG is the system used by the LCSC to verify addresses

REQUEST: Since BellSouth's implementation of the "single 'C'" order, some AT&T customers have lost dial tone at the time of conversion. Please describe the implementation process of the "single 'C'" and provide explanation of why a customer would lose dial tone.

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

Out of 18,230 orders issued for AT&T only 29 lines experienced a conversion related trouble which is a 0.16% trouble rate.

Of these 29 lines, 13 were on the same service order.

3 of these had a service representative error on the service order. The remaining were due to the facility assignments being changed.

See attached analysis.

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1. Service Order: CY4KQTF6 Completion Date: 4/02/2002
MBTN: 407 942-0150 Outages caused: 2
Analysis: The PIC did not update in switch translations during the conversion process.
2. Service Order: CO84DFW5 Completion Date: 4/05/2002
MBTN: 770 422-8978 Outages caused: 1
Analysis: Frame Tie Pairs were added to the facility assignment, and the Central Office Equipment and assigned facilities did not change but had Out and In activity.
3. Service Order: CP3QPB92 Completion Date: 4/05/2002
MBTN: 770 535-1172 Outages caused: 1
Analysis: The assigned facilities changed.
4. Service Order: CO7N7DP9 Completion Date: 4/10/2002
MBTN: 770 389-4156 Outages caused: 1
Analysis: The Central Office Equipment and assigned facilities changed.
5. Service Order: COC17HM5 Completion Date: 4/12/2002
MBTN: 770 774-0024 Outages caused: 1
Analysis: The assigned facilities changed.
6. Service Order: COFNXWP9 Completion Date: 4/12/2002
MBTN: 770 474-4909 Outages caused: 1
Analysis: The Central Office Equipment and assigned facilities changed.
7. Service Order: COY34713 Completion Date: 4/12/2002
MBTN: 404 249-1475 Outages caused: 1
Analysis: Frame Tie Pairs were removed from the facility assignment, and the Central Office Equipment and assigned facilities did not change but had Out and In activity.
8. Service Order: CPCXXXL3 Completion Date: 4/18/2002
MBTN: 770 784-5402 Outages caused: 1
Analysis: The Central Office Equipment and assigned facilities changed.
9. Service Order: CP0F4871 Completion Date: 4/22/2002
MBTN: 912 898-0449 Outages caused: 1
Analysis: Service denied by BST Business Office in error after the conversion completed.
10. Service Order: CO1N3FN5 Completion Date: 4/23/2002
MBTN: 404 605-0977 Outages caused: 1
Analysis: The Central Office Equipment and assigned facilities changed.

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11. Service Order: COM08445 Completion Date: 4/23/2002
 MBTN: 770 736-0132 **Outages caused: 1**
Analysis: The assigned facilities changed.
12. Service Order: CPDTNFK7 Completion Date: 4/24/2002
 MBTN: 912 233-2639 **Outages caused: 1**
Analysis: The assigned facilities changed.
13. Service Order: CRFG5MY2 Completion Date: 4/29/2002
 MBTN: 954 346-8375 **Outages caused: 13**
 Analysis: A LCSC Service Representative made an error removing 13 lines
 from the customer's account on the conversion order.
14. Service Order: CO7BPVW1 Completion Date: 4/29/2002
 MBTN: 770 474-7912 **Outages caused: 1**
Analysis: The Central Office Equipment and assigned facilities changed.
15. Service Order: CP2RC1X9 Completion Date: 4/29/2002
 MBTN: 912 234-6325 **Outages caused: 1**
Analysis: The assigned facilities changed.
16. Service Order: CO8WVF00 Completion Date: 4/30/2002
 MBTN: 770 516-2851 **Outages caused: 1**
Analysis: The assigned facilities changed.

REQUEST: How is the LMOS database updated to reflect migration of a BellSouth retail customer to a CLEC serving the customer via UNE-P? If the "N" order falls into a hold file, is the update to the database delayed? If the "N" and the "D" order complete separately, how does that affect the manner in which trouble tickets are handled in the LMOS database?

RESPONSE: BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

- (A.) When a BellSouth retail customer migrates to CLEC UNE-P service, the LMOS database (Host) is updated nightly by a batch program via the completed (CPX) service order to reflect the change in service provider.
- (B) Yes, but only on that particular "N" order. The LMOS database (Host) is updated nightly by a batch program of completed (CPX) orders only. If that particular "N" order falls out into a "HOLD FILE" status, then the CPX status of that "N" order is delayed and subsequently the LMOS Host update of that "N" order is delayed.
- (C) There are procedures in place in BellSouth's Customer Wholesale Interconnection Network Services (CWINS) Center to handle trouble tickets for customers that do not have an LMOS record due to service order activity at time of trouble receipt. If the "N" order and the "D" order completes separately, there is also a Mechanized Trouble Analysis System (MTAS) interface program that uses service order information to generate trouble history for customers if a trouble is generated before the LMOS database is updated.

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REQUEST: What is the complete list of functions for wholesale provisioning of line sharing and what are the associated task times?

RESPONSE: See Attachment No. 1. This data was taken from file TNLineSh.xls of BellSouth Compliance Filing dated June 4, 2002 in TRA Docket No. 00-00544.

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REQUEST: What efforts, if any, is BellSouth undertaking to lower the provisioning interval of lines shared loops? Please provide any and all documents containing information which supporting your response.

RESPONSE: BellSouth objects to this request to the extent it implies that BellSouth's provisioning interval is inadequate.

BellSouth is currently assessing the viability of lowering the provisioning interval of line shared loops. In that regard, BellSouth is investigating the affect of the various processes, flows, systems, etc. on the current interval.

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REQUEST: What process does BellSouth use to track and inventory to assignments to customer facilities located in CLEC collocation cages?

RESPONSE: We use TIRKS (Trunks Integrated Recordkeeping System), LFACS, SWITCH (FOMS), and LMOS.

REQUEST: In BellSouth documentation, BellSouth's maintenance priorities are listed as emergency customers first and regular maintenance priorities next. What are Bellsouth's regular maintenance priorities and in what order are the troubles associated with each type of customer service platform, e.g., UNE-Loop, UNE-Platform, DS1, resale, etc., handled?

RESPONSE: An algorithm is used to calculate maintenance priorities which includes several factors:

- Commitment
- Driving distance
- Type of service

Non-Design Type of Service Priorities

1. Hot Cuts (SL1 & SL2), First AM & HOT (PD7, PDX) dispatches (resale, UNE-P, SL1, retail)
2. SL2 Maintenance
3. Business OOS (includes UNE, ADSL, resale, UNE-P, retail)
4. Business affecting (includes UNE, ADSL, resale, UNE-P, retail)
5. Residence OOS (includes resale, UNE-P, retail)
6. Residence affecting service (includes resale, UNE-P, retail)
7. Cutover buried service wires

RESPONSE: (Cont.)

Design – Special Services

1. First AM dispatches
 - a) DS3 and above / DS1
 - b) DS3 and above (UNE, BBS)
 - c) DSO and below (UNE, BBS)

REQUEST: What process does BellSouth use to insure that all CLEC disconnect orders are worked and that billing has ceased for the associated facilities/services?

RESPONSE: All CLEC disconnect orders that have been received by the billing system appear on the daily service order extract file from SOCS (Service Order Communication System). The billing system reads this file on a daily basis and provides a status back to SOCS for each order that is to be processed by billing. The status values assigned by billing include "Re-circulate", "Error" and "Complete". A status of "Re-circulate" indicates to SOCS that the order has not been processed by the billing system and should be re-sent to the billing system for processing the next day.

A status of "Error" indicates that the order has been assigned a billing system hold file error, the order should be corrected, and the order should be re-sent to the billing system for processing. Steps are taken within the BellSouth billing groups to track and correct all orders that receive hold file errors. In addition, management regularly reviews hold file correction results for timeliness and/or accuracy.

The "Complete" status indicates that the billing system has completed processing of the order, the information from the order has been posted to the customer service record (CSR), and the order should be removed from SOCS and the extract file. Billing ceases for the associated facilities/services after the information has been posted to the CSR. All orders that have completed provisioning continue to appear in SOCS and on the extract file until the orders receive the "Complete" status from the billing system.

REQUEST: What process does BellSouth use for handling trouble reports filed by CLECs on the same day as the transition of service is performed?

RESPONSE: BellSouth provides CLECs with a process to handle service troubles on the "same day as the transition of service is performed" in a non-discriminatory manner equivalent to the process BellSouth provides itself. BellSouth's trouble handling process also provides CLECs with an estimated time to repair, an appointment time or a commitment time in accordance with the provisions of our "Operational Understanding" as agreed upon by the CLECs and BellSouth.

BellSouth's CWINS (Customer Wholesale Interconnection Network Services) Center call receipt representatives have been trained to receive such same day conversion troubles and each trouble receives immediate escalation to a first level manager. BellSouth provides the CLEC end users' trouble report with priority handling as is done with BellSouth's large business end users' trouble reports. Upon request, BellSouth provides CLECs with trouble status and accepts further escalation per the Operational Understanding agreement. BellSouth will promptly notify the CLEC of trouble resolution.

The Operational Understanding may be accessed via the Internet at <http://www.interconnection.bellsouth.com>.