

Before the  
Federal Communications Commission

JUL 10 2002  
FCC-MAILROOM

July 4, 2002

US POSTAL AIR  
Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St SW Room TWB-204  
Washington DC 20554

DOCKET FILE COPY ORIGINAL

RE: In the Matter of )  
Numbering Resource Optimization ) CC Docket 99-200  
Petitions for Reconsideration )

In the Matter of Bellsouth Tariff FCC No. 1,  
Transmittal Nos. 623 and 629 WCB/PPD No. 02-08

Dear Ms. Dortch,

As per the Commission's rules, I am sending one original and 4 copies of Peggy Arvanitas' Comments concerning the Cost Recovery For Number Pooling in the above referenced docket and tariff filing Of Bellsouth. If you have any questions, please feel free to contact me by phone or by email.

Sincerely

Peggy Arvanitas  
"The Lone Consumer"  
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In the Matter of Bellsouth Tariff FCC No.1  
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**Peggy Arvanitas' Comments and Petition for Reconsideration**

I have been unhappy with the lack of enforcement of the Federal Communications Commission, and the inability it has shown to enforce carefully written orders. If it cannot do even that, we would ask it give more authority to the State Public Utility Commissions.

I have read all the filings of FCC Docket 95-116. This docket is the introduction of a whole serious dialogue for the PUBLIC to the rules governing their numbers.

This docket saw the introduction of the 1996 Telecom Act that said over 122 times, "These are the public's numbers." And unfortunately, this was the most poorly written docket with no specific performance measures, and grandiose "loop holes" like AS TECHNICALLY FEASIBLE.

I had numerous ex parte conversations with then FCC deputy chief Yog Varna. One ex parte is on this Docket from February 2000. The ILEC's jumped the gun and filed their 1999 tariffs to start charging Consumer's phone bills with portability charges. The FCC 99-200 third order said they must be LNP capable. That did not deter them.

Only when, in Florida, Bellsouth was complaining it couldn't do pooling in a top 50 MSA like Miami, Jacksonville, and Ft Lauderdale did I become alarmed. And on PSC of Florida docket 981444 –tp conference call there was ugly fighting between Stan Greer, Bellsouth representative and I. Who would have known a consumer and her “kid brother” Emmanuel Arvanitas could absorb technical and federal documents to understand what was not occurring.

These are not wild accusations against Bellsouth. My brother works for Media One and as an Employee was getting his residential numbers ported. A Bellsouth representative called him in the middle of a port, and said she couldn't port his second home number over, but if he stayed with Bellsouth he could keep both of them. He declined, and they only ported one, EVEN THOUGH THE SECOND NUMBER HAD OVER 5 MONTHS OF PORTABILITY CHARGES ON IT.

Of course he did a PSC complaint. The PSC employees and/ or their supervisors dropped it.. If that complaint came to the FCC from a consumer, could the FCC identify the ILEC's were in violation of the Portability order?

Please do not allow any states to be charged pooling charges on phone bills if you can not remove all reasonable doubts of illegitimate pieces of equipment being padded for cost recovery.

Questions I am asking the FCC that the PSC Commissioners did not are as follows:

- 1) Are the Capital Costs Bellsouth is asking to be reimbursed for double recovery?
- 2) The Network of Bellsouth's is a Regional one. All states are not allowing state cost recovery. They are waiting for the federal cost recovery. Therefore, as a CONSUMER IN FLORIDA, how are we assured we are only absorbing 1/9 of the costs, and the other 8/9's of costs will be redistributed when that state accepts the

FCC federal cost recovery? In other words, I believe that the State of Florida will absorb ALL OF THE INITIAL cost of Bellsouth upgrading it's ONE BIG REGIONAL NETWORK for pooling.

- 3) Are all the area codes in Florida legally supposed to have pooling costs on their bills? What other software must Bellsouth put on it's switches in that particular area code before it charges for pooling? It is my understanding that the PSC of Florida is expecting it to be on every consumer's bill, and the State Congress has just been made aware of it in the last few months.
- 4) Can the State of Florida legally allow Bellsouth to be reimbursed for Capital costs? Bellsouth wants to be reimbursed for things like 5ESS Lucent switch software. In over 50% of it's switches in Florida (according to PSC docket 981444-tp 1AESS July 2000 filing) they have 30 year old 1AESS switches. Am I to assume they will also charge for the 5ESS switch hardware costs? Didn't the portability order allow the portability charge for switches in the third order? How many times are we as consumers going to pay for switch upgrades from 1999 portability costs, and they are projecting Miami won't get new switches until 2004!
- 5) If the State of Florida PSC allows Bellsouth the "extra goody" of capital costs" in their pooling cost recovery, is the State of Florida PSC in violation then of Florida Statutes 120.50? That statute says the State of Florida PSC must acknowledge the language of the FCC orders and incorporate said language in states orders. Therefore, I can sue the state of Florida?

To Bellsouth officials in Florida, I am sure they are happy with their friends in the PSC, the lovely staff and attorneys that bend over backwards and convenience an ILEC. Goodness, we wouldn't want to give the PSC budget constraints. We wouldn't want to make a billion dollar phone company to sue anyone to death, like they have what's left of their competitors. And this is to remind everyone in Florida and beyond I was denied intervention in a serious docket AFTER I had filed my comments, I am attaching them to this docket, for reference. In Florida, Bellsouth wants the same pieces of equipment for state POOLING that they filed and asked for FEDERALLY in the FCC docket for PORTABILITY FOUR YEARS EARLIER.

Knowing this now, I demand the FCC refuse to approve the above mentioned

Bellsouth tariff for pooling. I would also ask the FCC to order that any Telephone company filing a federal tariff must also file a STATE tariff, especially if that state has a state cost recovery plan. And that ALL COST RECOVERY plans for POOLING be in compliance of FCC Orders. Please don't make the citizens of Florida BEG for justice.

Sincerely



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BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

NUMBER POOLING COST )  
RECOVERY AND ALLOCATION ) PSC Docket No. 001503-TP  
DOCKET FOR THE STATE OF )  
FLORIDA )

Peggy Arvanitas' Comments

As the lone consumer on this cost recovery for number Pooling docket, I am taking this opportunity to do a very in depth filing that I feel is lacking within the Industry and the public service Commission of Florida staff employees, some who are from electric and wastewater divisions and have no previous telecom experience. Since no FORMAL notification was advertised for this filing, according to administrative procedures, one cannot close a docket to comments that was not legally and administratively open for comments. therefore, I am notifying pSC staff that I consider this timely filed.

There seems to be some misunderstanding that if florida is doing its own pooling trials outside of the scope of the national pooling trials, that federal orders from FCC 95-116, FCC 00-104, and FCC 00-429 do not apply to Florida laws. According to florida statutes 120.50, florida must incorporate federal order language in state orders. And F.S.120.80 says Florida must incorporate the language of the 1996 Telecom act into state order language. The state cost recovery is not a slush fund wherein one may dump everything including grandma's condo fees into the Industry's cost recovery for pooling. For the state of florida's cost recovery to conform to the federal pooling trials, we must follow the dictates for federal cost recovery. We are only sorry that the FCC did not select a national pooling administrator and leave the states and the Industry in this predicament.

The other concern i have as I read the filings done by the Industry, especially Bellsouth, is the incredible opportunity bellsouth and other older-equipment ILECs are taking to ask for recovery for the SAME EQUIPMENT THAT THEY RECEIVED REIMBURSEMENT FOR WITH THE PORTABILITY DOCKET 95-116 in 1998, and 1999! And we cannot have this occur, because, FCC order 00-104 ¶224:

"We noted with regard to number portability cost recovery that '(c)arriers already allocate general overhead costs to their rates

BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

for other services, and allowing general overhead loading factors ... might lead to double recovery."

So I will also identify, for the industry and pSC of florida, since equipment infrastructure seems to be your weakness, a breakdown or roadmap to sanity for you.

NUMBER POOLING COST RECOVERY WILL FOLLOW THE SAME  
THREE CLASSIFICATIONS AS NUMBER PORTABILITY

FCC Order 00-104, ¶193 says:

"In this report and order, we adopt cost recovery principles that are similar to those established for number portability. We conclude that the technical requirements of 1000 block number pooling and number portability are very similar, and thus, adopting different methods of cost recovery would create an unnecessary administrative burden on the carriers and the numbering administrator."

The three classifications are 1) costs that are shared between carriers, 2) costs directly related to number pooling (portability) and 3) costs NOT directly related to number pooling (portability). Unfortunately, we have a major ILEC, Bellsouth, who hasn't read FCC orders. According to Bellsouth's Feb. 2001 filing with the pSC of Florida, they say:

"..BellSouth is unable, however, to provide a detailed cost study at this time,...."The lack of cost information, however, should not preclude the commission from establishing an interim cost recovery mechanism, since the cost recovery mechanism is not dependent of the types of costs." (pg 5)

Unfortunately, BellSouth does not "have a handle" on FCC orders, and so I am hoping the Commissioners will be able to read Orders better.

BellSouth further advises the PSC of Florida that "all of the florida specific costs and an allocated portion based on access lines of the regional costs associated with number pooling pooling be assigned to Florida for recovery." (pg 7) Unfortunately, this is not "competitively neutral" in violation of the section 251(e)(2) of the 1996 Telecom Act. But we will revisit this later in the filing.

IF YOU WERE ALLOWED SPECIFIC COST REIMBURSEMENT FOR PORTABILITY  
YOU WILL NOT BE ALLOWED IDENTICAL EQUIPMENT REIMBURSEMENT FOR  
POOLING

If all is lost and Florida Commissioners are confused, the FCC has given us all a "but for" test that they used in the number portability proceedings. FCC 00-104 ¶218:

"We find that the 'but for' test used in the number portability

"preceeding should also be used by carriers to identify carrier-specific costs directly related to 1000 block number pooling and administration."...."We adopt, therefore, the two part 'but for' test described above as a method of identifying the costs that are directly related to thousand block pooling. Costs that both would have not have been incurred by the carrier 'but for' the implementation of 1000 block pooling AND were incurred'for the provision of' 1000 block pooling are eligible for recovery and should be identified in the cost studies."

BellSouth, in FCC 95-116 docket-portability order had an Aug. and November 1998 filing in which they identified over 20 pieces of equipment for portability cost recovery as they are now asking, 3 years later, in a state of florida number pooling cost recovery docket. I am attaching this to the state of Florida filing, so that bellSouth and the Commission can weed through, with the ever loving CLECs, what should be excluded for fear of double recovery. I will take the opportunity to highlight a few of the most obvious "faux pas". And together, we will apply the "but for" tests together.

BellSouth has a group of "network costs" that, according to it's Feb 2001 PSC of florida filing it should be reimbursed for Switch feature upgrades- 5eSS, DMS 100, "network hardware" switch generic software upgrades It says these upgrades "will be advanced in order to provide TNP." (pg 14) According to 981444-tP docket and the order PSC-01-0051-PAA-TP, Bellsouth proclaimed it had 19 1AESS switches that are over 28 years old. BellSouth had the adacity to wait until after a pooling trial docket. to proclaim it's switches were too old to pool. Lucent says the life span of AESS switches is only 20 years. So, a good 50% of BellSouth's switches in the State of Florida are on it's deathbead. Pray tell, how can we do switch software upgrades on 5ESS switches if we still have AESS switches? Is BellSouth expecting 100% cost reimbursement for 19 1AESS switches, too? You need to upgrade switches for POTS, UNE's with other CLEC's and the like. The "but for" test fails for number pooling. This is a portability cost upgrade

OSS and Service management system upgrades are listed as pooling costs upgrades. (pg 15). Unfortunately, these were portability upgrades, and are only recoverable under the portability surcharge in our phone bills. OSS upgrades were also listed as costs for pOTS (plain old telephone service). How many times are we going to recover these same costs?

ATLAS and COSMOS are inventory software that they had to upgrade because of number classifications changed by FCC 00-104 (administrative, reserved, intermediary numbers)Of course, I remembered these TN systems because even after the FCC gave Industry an extra six months

upgrade their TN systems, bellSouth was still a month late, and could not report their utilization thresholds. Why are they including these systems in their pooling costs? Billing and provisioning systems, by their nature, would still need to be upgraded , as they are necessary for POTS.

BellSouth also declared in our PSC 00-1046 number pooling order that it needed to be reimbursed for SS7 upgrades. SS7 networks use signalling links to transmit routing messages between switches, and switches and call related databases. Also between line information Database, Toll free calling, and AIN databases. SS7 supports AIN networks switches. An AIN capable switches are used in the deployment of number portability, wireless roaming, voice recognition services, and CLASS services.

of course, we all know that in our 1999 psc legislative report was full of proclamations that BellSouth and Verizon made to the Commission that it was none of your business how much money they made on CLASS vertical services , such as call waiting, call forwarding, voice mail... Even though over 50% of both of these ILEC's customers paid for more than POTS with these extras, your lovely ILECs would not disclose the revenue and gave NO COST ALLOCATION to equipment (lines and switches) and therefore we have a magnifiscent inflated cost allocation for plain old phone service. And no cost allocation for CLASS services. And so, should GTE or BellSouth be allowed to recover these equipment upgrades? "Wouldn't have to upgrade 'but for' number pooling.....?"

As I come to a frightful close of this pathetic charade of blunders from a Bellsouth filing, I am wondering if Levent Ileri and I (since we are the Mommy and Daddy of the state Cordination Group) couldn't give you the phone numbers of some good state Commissioners, so that you consult with experts who have gone before you and conquered the Industry because you are so busy dismissing the only intelligent consumer in this docket who reads. If the Industry does not want to produce costs then I demand the PSC withhold cost recovery until such time you can physically review costs and uphold your fiduciary duties to defend the pocketbook and sanity of the State of florida Consumers. Anything less would be in violation of federal orders and florida statutes.

your Lone Consumer you keep dismissing for some strange reason,

*Peggy Quaranta*  
(727)-742-1386

OSS DEFINITIONS		
BELLSOUTH SYSTEM	DESCRIPTION	DESCRIPTION OF LNP MODIFICATION
ATLAS	"Application for Telephone Number Load Administration and Selection" performs telephone number load and selection including selection of common language circuit ID serial numbers in a TN format. In addition, ATLAS supports TN selection, inventory and assignment for services beyond POTS, including complex services, small business services and AIN services.	BellSouth modified ATLAS for LNP to handle TN administration because COSMOS, which currently performs TN assignment, is a wire center based system, whereas LNP calls for a cross wire center view of TNs. BellSouth also developed a SOAC LNP interface with ATLAS to administer ported telephone numbers.
BONIS	"BellSouth On-line NXX Information System" is a Corporate Data base system that supports the following capabilities: <ul style="list-style-type: none"> <li>• Selects a NPA NXX for assignment to a Code Applicant</li> <li>• Verifies that it does not pose cross-boundary seven-digit dialing conflicts</li> <li>• Notifies the Code Applicant of the assignment and effective date</li> <li>• Issues the Code Memorandum that activates the NPA NXX in the BellSouth network</li> <li>• Feeds P/SIMS to provide the negotiating systems and ATLAS with LNP eligibility data and to provide LNP eligibility data on BST NXXs to RDBS inputters.</li> <li>• Feeds ARTS for CCM routing</li> <li>• Provides ability to generate LNP eligibility report to OSs that are not able to accept a mechanical feed (CRIS CO data base).</li> <li>• Capability to generate reports for Public Utilities Commission requests for data/interrogatories.</li> </ul>	BellSouth enhanced BONIS Data base for LNP to support new business processes related to Service Provider Portability ("SPP") including sending downstream work groups a code memorandum containing sufficient information to activate LNP NPA NXXs.
CABS	"Carrier Access Billing System" - Used to access, retrieve, record, process, transmit and render access customer billing data.	BellSouth modified CABS for LNP to address message processing changes required to accommodate for the loss of NPA NXX uniqueness such as LRN Lookup, 800 Data base queries made from a ported number, AMA recording, and access bill changes.
CARE	Carrier Access Record Exchange - used to process equal access records	BellSouth modified CARE for LNP to address design changes for recognition of telephone numbers from/to BellSouth in order to provide notification to the appropriate Primary Interexchange Carrier ("PIC") and Local Primary Interchange Carrier ("LPIC") of record.

OSS DEFINITIONS		
BELLSOUTH SYSTEM	DESCRIPTION	DESCRIPTION OF LNP MODIFICATION
COFFI	"Central Office Features File Interface" - is an inventory/data base interface for service order negotiation systems and other network systems. On-line systems can access COFFI to retrieve information on services, features, PIC/LPIC data that is applicable to a particular NPA NXX.	BellSouth provided upgrades to COFFI for LNP to allow the users access to information to associate CLEC NXXs with: Toll Message Rate Center ("TMRC"), LNP Capability Indicator, (Indicator that NXX is owned by a CLEC), and a LNP Capable Date. For service order processing flow through, COFFI upgrades address requests from the service order negotiation systems to map the first six characters of the LRN associated with a NPA NXX to the service order.
CRIS/BOCRIS	"Customer Record Information System/Business Office" CRIS: Used to access, retrieve, record, process, transmit and render retail (Business & Residential) customer billing data. "BOCRIS" is an on-line system used to access and input customer data required to support service order and message processing and billing.	BellSouth modified CRIS for LNP to address service order processing and message processing changes associated with number porting. Upgrades to CRIS include changes to system features and functions designed to accept and retrieve information necessary to recognize, record, and bill for number porting services.
DIS	"Data base Integrity System" compares data elements in BOCRIS, RSAG, LFACS, COSMOS, and LMOS. In comparing the data bases, DIS identifies discrepancies, makes logical corrections based on interdepartmental rules, and generates update files to the originating systems.	BellSouth enhanced DIS software for LNP to recognize new loop statuses in LFACS, COSMOS, and LMOS introduced by LNP.
DDNS	"Directory Delivery Notification System" - Primary function of DDNS is to review all service orders daily to identify order activity that indicates that directories need to be delivered. DDNS passes specific field data to the BellSouth Advertising & Publishing Company ("BAPCO") Directory Delivery System for completing the processes required to deliver directories to customers.	BellSouth modified DDNS for LNP to support LNP address changes required to recognize and react to specific Field Identifier data, ZLSA/EXK - the service order address for NXX exchange key, identifying CLEC NPA NXX and initiating notification to BAPCO to process and complete the delivery of directories to customers.

OSS DEFINITIONS		
BELLSOUTH SYSTEM	DESCRIPTION	DESCRIPTION OF LNP MODIFICATION
DOE/DSAP	"Direct Order Entry/DOE Support Application" - Service order negotiation system used by BellSouth Business Services Centers (Small Business, Complex Business, Local Customer Service Center) to process and issue orders for GA, FL, NC, SC.	BellSouth modified DOE/DSAP for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs and Universal Service Order Codes ("USOCs"), service order negotiation and activity types.
DPRO	"Digital PROvisioning" - assists the Outside Plant Engineer in creating and distributing the span design for customer DSI services.	Enhanced DPRO for LNP to accept concept of CLEC NPA NXX occurring in more than one BellSouth switch.
E911-IREIS/BSSDI	E911/BSSDI is an arrangement by which BellSouth E911 Telephone Number ("TN") subscriber records, or any other CLEC subscriber records residing in the Interim Regional Emergency Information System ("IREIS"), can be provided to another E911 system. BellSouth has been requested to provide their TN subscriber records to other E911 Systems where BellSouth is not the lead telephone company in a county, municipality, or parish.	BellSouth implemented National Emergency Number Association ("NENA") Company-ID values for data exchange, use of NENA Company-ID values from unauthorized data base updates, and inclusion of NENA Company-ID values in the Address Location Identifier ("ALI") data stream.
HAL	"Hands-Off Assignment Logic" is a terminal emulation system that resolves Request for Manual Assistance (RMA) in the AFIG.	BellSouth enhanced HAL for LNP to recognize the new LNP FIDs and screen changes associated with this data. ATLAS TN inquiries will also be added to support TN Administration move from COSMOS.
IBIS	"Interdepartmental Billing Investigation System" - Billing accuracy control that is used to initiate the investigation of billing defects.	BellSouth modifications to IBIS for LNP were the development of a new field to supply the LRN for WFA to dispatch/initiate completion of billing investigation cases that are forwarded to network for resolution.
IBISDI	IBISDI - is a Taskmate interface between IBIS and WFA-DI. It mechanizes both the loading of billing investigations to the appropriate person within the NISC and the closing of IBIS cases back to the originator.	Prior to LNP, IBISDI makes loading decisions to send to WFA-DI based on AMA Office Identification or on NPA NXX. With LNP the NPA NXX can no longer be used to select the WFA-DI location. BellSouth modified IBISDI to recognize the LRN that IBIS is supplying
ISP	"Installation Support Package" screens and reformats the service order for download to mapper, a programming language.	BellSouth enhanced ISP to accept new LNP FIDs to derive the appropriate unit number.

<b>OSS DEFINITIONS</b>		
<b>BELLSOUTH SYSTEM</b>	<b>DESCRIPTION</b>	<b>DESCRIPTION OF LNP MODIFICATION</b>
LCCAM	"Line Class Code Assignment Module" mechanically assigns line class codes.	BellSouth enhanced LCCAM for LNP to read the data following the Field Identifier Exchange Key ("FID EXK") and use the data to determine which NPA NXX table in LCCAM to use to apply a line class code.
LEACS	"LMOS Error Analysis and Correction System" provides terminal emulation for error resolution.	BellSouth enhanced LEACS to read new LMOS screens implemented for LNP to support accounts that include Primary Line Identifiers ("PLIDs") and Secondary Line Identifiers ("SLIDs"), Ported Out ("POUT") scenario for LMOS data base update, TN Reclaim, and to update screen to BOCRIS to identify POUT FID.
LEAP/TAP	"Testing and Analysis Program" performs testing, analysis and referral of troubles on Service Orders ("SO") due today.	BellSouth enhanced TAP for LNP to use FID LRN instead of NPA NXX for routing test requests to the correct central office test system.
LIST	LIST - Provides directory information to the Operator Services Systems for Directory Assistance. LIST feeds Directory Assistance and Operator Services wholesale products data bases and validates service order listing entries.	BellSouth modified LIST for LNP to include changes to recognize CLEC NPA NXX based on the FID ZLSA/EXK and to retrieve and distribute to the Directory Assistance and Operator Services data bases listing data associated with number porting.
LMOS HOST -ALRU	"Automated Line Record Update" reads Service Orders in completed status from SOCS and executes batch runs to LMOS to update LMOS line records with Service Order activity.	BellSouth enhanced ALRU for LNP to mark Service Orders as Hybrid D or Port-Out, moved POUT FID in Unfielded identification section of SO to Service and Equipment ("S&E") section, changed the ported inventory update field identifier ("INVU FID") to ZNVU and changed POUT to ZPOUT when there is an appearance of the FID INVU on an outward action code (O) on a D order or C order in the S&E and a POUT FID on the same outward USOC line, and utilized EXK FID for Port-In SOs.
MISOP	"Mechanized Interface to the Service Order Processor" - Mechanized service order generator for automated systems such as RightTouch, Complex Services Profile System ("CSPS"), Directory Orders, Online Treatment, and Independent Company Number Services ("ICONS"). MISOP feeds information to the service order negotiation systems, SONGS and DOE to generate service orders.	BellSouth modified MISOP for LNP to provide system capability to recognize and retrieve FID data for NPA NXX in association with a BellSouth switch when a CLEC order is being issued or when the service request pertains to a ported number.

<b>OSS DEFINITIONS</b>		
<b>BELLSOUTH SYSTEM</b>	<b>DESCRIPTION</b>	<b>DESCRIPTION OF LNP MODIFICATION</b>
<b>MSA Test Terminations</b>	"Metropolitan Statistical Area Test Terminations" for LNP testing (both intra-company and inter-company). Local test terminations will allow the testing of BellSouth's ability to Port-Out and Port-In telephone numbers as well as the testing of a CLEC switching network inter-connectivity to BellSouth's. Also, will be used to test the internal BellSouth ordering, provisioning, billing and maintenance process and by the CLECs in their LNP test cases. LNP tests provide the BellSouth work centers with a working knowledge of the new service capabilities and switching requirements of LNP.	Same
<b>NETTS</b>	"Network Trunk Translations System" application is used to automatically generate trunk group and member level translations for the Circuit Provisioning Group ("CPG").	BellSouth enhanced system to support new LNP trunk group options and architecture changes for new CLEC facility based trunk groups.
<b>ORION</b>	"On-Line RSAG Interface for Order Negotiation" is an interface used by service reps to view the RSAG information based on service address. ORION provides an on-line presentation of RSAG address and living unit data for users of the service order negotiation systems for service input and address validation.	BellSouth modified ORION for LNP to display information (NPA NXX - first six characters of the LRN) to the service representative when an address validation occurs in RSAG in connection with a ported number. ORION will display data for the CLECs based on data received from RSAG and COFFI.
<b>OVERTURE/ ROS</b>	"Regional Ordering System" is a service order negotiation system that will replace the SONGS and DOE/DSAP legacy systems to provide regional service order negotiation and generation functionality for the Business Services Centers.	BellSouth modified ROS for LNP to provide center capabilities to negotiate and generate services orders for Port-Out and for Port-In to the appropriate central office switch in the BellSouth TMRC.

<b>OSS DEFINITIONS</b>		
<b>BELLSOUTH SYSTEM</b>	<b>DESCRIPTION</b>	<b>DESCRIPTION OF LNP MODIFICATION</b>
<b>P/SIMS</b>	"Products/Services Inventory Management System" is an inventory system that is used to access information on central office services, features, availability dates and NPA NXX.	BellSouth modified P/SIMS for LNP to associate all LNP capable NXXs belonging to CLECs with a BellSouth Central Office. Information regarding feature availability and service for a given NXX is maintained by P/SIMS and distributed to the service order negotiation systems to process service orders in connection with a ported number.
<b>RE-LOG</b>	"Referred to Engineering Log" system provides Outside Plant Engineering, Construction, Installation & Maintenance, the Address Facilities Group, and Consumers a means of mechanically tracking all held service orders in BellSouth.	BellSouth expanded the SOCS/ReLOG interface for LNP to include new LNP FIDs and tags. SOCS must be able to set a flag via FIDs to capture orders that fall into the LNP category. BellSouth enhanced Rel. LOG to receive this new data and store it for retrieval.
<b>RICC (DBAS II INTERFACE)</b>	RICC is a BellSouth mainframe interface system which receives service order data from SOCS and passes it to DBAS II for use in calling card validation.	BellSouth modified RICC for LNP to provide the capability to recognize ported number data on orders received from SOCS and is passed to DBAS II.
<b>RIGHTTOUCH</b>	RightTouch is an automated BellSouth system used by Consumer customers to make payment arrangements and order calling services.	BellSouth upgraded RightTouch for LNP to address changes for the system to recognize numbers that are ported-In from a CLEC as a BellSouth customer to provide customers with ported numbers access to automated features for making payment arrangements and for ordering calling services.
<b>RNS</b>	"Regional Negotiation System" is a service order negotiation system used by BellSouth Consumer Services Centers to process and issue retail orders for residential consumers.	BellSouth modified RNS for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs/USOCs, service order negotiation and activity types.
<b>RSAG</b>	"Regional Service Address Guide" is an inventory system that maintains an association of street addresses to BellSouth wire centers used for service order processing.	BellSouth modified RSAG to allow a CLEC NPA/NXX to be associated with the appropriate BellSouth switch within a TMRC for processing orders associated with number porting.

OSS DEFINITIONS		
BELLSOUTH SYSTEM	DESCRIPTION	DESCRIPTION OF LNP MODIFICATION
SNECS	SNECS interfaces between TAFI and MARCH to create line recent changes that correct customer trouble reports.	SNECS selects the switch that requires the line recent change based on NPA NXX tables provided by MARCH. Because LNP will require that NPA NXXs be duplicated within rate centers, this table will be obsolete. BellSouth modified SNECS to allow it to obtain the switch for LNP lines from TAFI.
SOCS	"Service Order Control System" provide routing and distribution of service orders to associated service order processing systems (for example, network systems, billing, systems, Service Order Edit Routine, LNP Gateway, etc.).	BellSouth upgraded SOCS for LNP for navigator contract arrangements with the LNP Gateway to send information on Port-Out and Port-In orders to the LNP Gateway. The information is used to provide routing information (LRN) to the NPAC.
SOER	"Service Order Edit Routine" is a subtask of SOCS, and interfaces with all the service order negotiation, provisioning, and billing systems associated with service order processing.	BellSouth upgraded SOER for LNP to mechanically validate/edit service orders containing LNP FIDs and/or USOCs, required for service order flow through.
SONGS	"Service Order Negotiation System" is a service order negotiation system used by BellSouth Business Services Centers (Small Business, Complex Business, Local Customer Service Center) to process and issue orders for AL, MS, KY, TN LA.	BellSouth enhanced SONGS for LNP to provide the capabilities to negotiate and generate service orders associated with number porting, including screen changes, edits, system interface upgrades, new FIDs/USOCs, service order negotiation and activity types.
TAFI	"Trouble Analysis Facilitator Interface" provides a mechanized interface to OSS involved with the repair process. TAFI uses rules based logic to provide automated trouble receipt, screening, and resolution for repair technicians in the Business Repair Center ("BRC") and the Residential Repair Center ("RRC").	BellSouth provided changes to TAFI for LNP to accommodate corresponding changes to LMOS and MI.T. Software changes were made to interface with the LNP TA application to allow repair technicians to access TAFI data through the LNP TA GUI.