
BellSouth Interconnection Services

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September 20, 1999

James N. Newberry, Jr.
Wyatt, Tarrant & Combs
1700 Lexington Financial Center
Lexington, Kentucky 40507-1746

Dear Mr. Newberry:

Enclosed herein are BellSouth's responses to the questions posed by Pilgrim in its August 9, 1999 letter to Leah Cooper. If you have any questions, or need any additional information on these issues, please let me know.

Sincerely,



Susan M. Arrington
Manager, Interconnection Services/Pricing

cc: Leah Cooper

BellSouth's Responses to Questions
Posed by Pilgrim Telephone on August 9, 1999

Request #1:

Please provide us detailed technical documents describing the data fields available, features, and functions, or a reference to the exact names, ordering numbers and vendor of these documents, for each of the following systems as referenced in Attachments 1 and 2: LENS, TAG, CRIS, RSAG, SCE/SMS, DBAS, EDI, EDI-PC.

Response:

Information about each of these systems/services can be found on BellSouth's interconnection website: www.interconnection.bellsouth.com and is also covered during CLEC Basic Training. CLEC Basic Training is conducted after the parties have negotiated and signed an agreement. User guides are available on the website and will be provided to CLECs as needed, by the account managers during the implementation of their agreement.

Request #2:

Pilgrim may wish to provide a facilities-based voice mail service to compete with BellSouth's Memory Call service. For the purposes of this request, please assume that a subscriber elects to buy dialtone from BellSouth, and that Pilgrim wants to offer that subscriber Voice Mail service in competition with BellSouth's Memory Call. Also, please assume that Pilgrim owns all the switching and equipment necessary to provide the service, except for those components of the service that, by their nature, must be provided by the dialtone provider. Please inform us if BellSouth is willing to provide Pilgrim the services necessary to perform the following functions, all of which BellSouth provides itself, and all of which are necessary for Pilgrim to provide a competitive service:

Response:

BellSouth maintains that its Memory Call service is not a telecom service and therefore BellSouth is not required to make this service available for resale. BellSouth has agreed to make Memory Call available for resale on its own accord, however, the resale discount does not apply. To the extent the services which Pilgrim needs to provide for its own form of "voice mail service" are offered either through resale or through BellSouth's tariffs. BellSouth will provide these services to Pilgrim upon request at the tariffed rates.

Request #3:

Please provide us a copy of the document referenced in Attachment 2, Paragraph 10.6.4.1, or reference to a vendor for that document.

RESPONSE:

This is a Nortel document and can be obtained from a Nortel representative.

Request #4:

Regarding DADAS service referenced in Attachment 2, Paragraph 10, where are the interface points at which BellSouth provides this service?

Response:

The point of access for the DADAS service is in Jackson, Mississippi, although the service has been provided out of the Charlotte office with additional arrangements negotiated between the customer and BellSouth.

Request #5:

Please identify the databases provided as referenced in Attachment 2, Paragraph 12.2.1.2. For each of the databases so identified, please provide us detailed technical documents describing the data fields available, features, and functions, or reference to the exact names, ordering numbers, and vendors of these documents.

Response:

The databases listed in Attachment 2 Paragraph 12.2.1.2 are Toll free dialing, Call Name database, LNP database and LIDB. Information regarding the features and functions of these databases is available at www.interconnection.bellsouth.com

Request #6:

Please provide us with a list of the customer data items with Pilgrim would have to provide in order to support each required LIDB function pursuant to Attachment 2, Paragraph 13.4.2.2.

Response:

Please see the attached document for a list of the customer data items required for LIDB.

Request #7:

In Attachment 2, Exhibit A, Paragraph I.C.a., for subscribers in LIDB, CLEC appears to be required to provide BST payments for calls made by CLEC subscribers. Does BST offer a reciprocal payment for calls made by BST subscribers?

Response:

The BellSouth LIDB stores certain subscriber information, at no charge to the CLEC, at the request of CLEC, and provides access to such information to BellSouth, LIDB customers, and other CLECs. LIDB is accessed for the purpose of billed number screening, calling card validation and fraud control. Reciprocal payments for LIDB are not appropriate since Pilgrim does not have its own LIDB.

Request #8:

In Attachment 3, Paragraph 1.5, RCF and FX subscribers are often not in the same physical location as an NPA/NXX serving wire center. How is this handled?

Response:

BellSouth requests that CLECs utilize their NPA/NXXs in such a way as to provide the necessary information so that BellSouth can distinguish local from intraLATA toll traffic for BellSouth customers. CLEC's end users' assigned NPA/NXX line numbers shall be physically located in the BellSouth rate center with which the NPA/NXX has been associated when BellSouth delivers traffic to CLEC for termination. If BellSouth is unable to determine the jurisdiction of the traffic due to the manner in which CLEC has utilized its NXX codes, BellSouth will treat such traffic as toll, unless CLEC provides BellSouth sufficient information to determine the appropriate jurisdiction of the traffic.

Request #9:

Please explain the nature of the obligations set forth in Attachment 3, Paragraph 1.7. Who bills AT&T? Both parties?

Response:

Each party bills the IXC (AT&T) their own access service rates. The party providing the end office function will bill the interconnection charge.

Request #10:

We have a series of questions relating to Attachment 3, Paragraph 8:

- (a) What happens when our customer dials a BST 976 or N11 number?

Response:

The CLEC obtains a 7 or 10 digit local number to route the calls made to the three digit number. All switches within the basic local calling area are programmed to translate the three digit code to the designated point-to-number. When the caller dials the three-digit code associated with a subscriber's information service and/or customer service organization the switch recognizes the three-digit code as an abbreviated dialing string, deletes the three-digits from the dialing string and translates them in to the 7 or 10 digit point-to number the switch routes the call to the 7 or 10 digit point-to number.

- (b) Are we billed for the premium charge, does BST do that itself, or are the calls blocked?

Response:

CLEC has the option to request blocking on those calls.

- (c) Does BST offer a reciprocal treatment under (b) for calls going the other direction?

Response:

Reciprocal compensation is paid by both parties for the costs of transporting and terminating calls on each other's networks. Traffic to ISPs and ESPs is considered to be interLATA traffic and not local traffic, therefore, this type of traffic excluded from this arrangement.

- (d) If BST bills us, and we must bill our end users, how do we get rate information from BST?

Response:

Pilgrim charges its own rates. BellSouth bills the CLEC and provides usage records for the CLEC's end-users or for the UNEs ordered by the CLEC.

- (e) How can we offer a competitive 976 or N11 service with BST?

Response:

BellSouth does provide market business plans for CLECs.

- (f) How do we work reciprocal compensation for each other's N11 and 976 traffic, both the transport and premium portion thereof?

Response:

BellSouth does not understand Pilgrim's request. Please provide a more detailed explanation of your specific request.

- (g) ESP/ISP traffic exclusion appears to reserve this portion of the market to BST. Please explain the rationale for the exclusion.

Response:

The FCC ruled that ISP/ESP traffic is interLATA, not local, therefore reciprocal compensation does not apply.

- (h) Is BST willing to make alternate reciprocal compensation arrangements for ESP/ISP traffic?

Response:

No. As stated above the FCC has ruled that this type of traffic is interLATA, not local, therefore reciprocal compensation does not apply.

Request #11:

With regard to Attachment 5, Paragraph 1, how do we gain access to 976 and N11 numbers for our customers?

Response:

BellSouth N11 Service is currently available in Alabama, Florida, Georgia, Louisiana and Tennessee. Complete rate, regulation and specific N11 code availability information is available in Section A39 of the BellSouth General Subscriber Services Tariff for each respective state. Numbers are available

through the CLEC's account manager. The account manager can provide information on the process for obtaining the numbers and will provide the implementation forms.

976 numbers are available only where facilities permit and central offices are equipped. The CLEC account manager provides information on obtaining 976 numbers. The appropriate tariffs and the CLEC Handbook contain pertinent information about this service, as does BellSouth's interconnection web site.

Request #12:

Would SPNP, as defined in Attachment 5, Paragraph 3.1, be available to Pilgrim if it attempts to win business from BST's 976 and N11 customers?

Response:

BellSouth does not understand Pilgrim's request. However, SPNP is an interim service arrangement whereby an end user can retain use of his existing assigned telephone number, as long as the end user remains at the same location or within the same serving wire center, when changing local service providers.

Request #13:

With regard to Attachment 5, Paragraph 3, the 976 and N11 tariffs provide for billing BST customers for calls to these numbers. What OSS is provided by BST to make possible a competitive offering by a resale CLEC?

Response:

BellSouth's Operational Support Services (OSS) are electronic interfaces used by CLECs to order services for both Resale and UNEs. OSS is an ordering interface, not a billing mechanism.

Request#14:

In Attachment 6, Paragraph 2.2, what are LENS, TAG, CRIS and RSAG, and what features, functions, and data fields are available through them?

Response:

As stated in response to Request #1, informations regarding these systems are available at: www.interconnection.bellsouth.com.

Request #15:

In Attachment 7, we understand that CATS and NICS provide for transmission, billing, and revenue settlement of certain call types among CLECs and ILECs, and we understand that they provide settlement for collect, calling card and third number intra-LATA toll calls. We have some additional questions about the message types supported. Do the systems provide settlement for the following types of calls?

- (a) A BellSouth customer places an intra-LATA call to directory assistance on another LEC's network, billed to his BellSouth calling card or BellSouth home number.

Response:

The DA call will have a self-descriptive text explanation and unique EMI record ID (010132).

- (b) A BellSouth customer places an intra-LATA call to his BellSouth voice mail service on another LEC's network, billed to his BellSouth calling card or home number.
- (c) A BellSouth customer places an intra-LATA call to his CLEC provided voice mail service on another LEC's network, billed to his BellSouth calling card or home number.
- (d) A BellSouth customer places an intra-LATA conference call on another LEC's network, billed to his BellSouth calling card or home number.

Response:

There are several EMI record IDs for conference calls (010106, 010107, 010108 & 010109) and the EMI record ID for voice mail is 010117. However, if either the voice mail service or the conference call service were alternately billed, we would format these calls on EMI record ID 010101.

- (e) All of the above, billed as non-deniable charges, with adequate text descriptions of the charges.

Response:

All of the above would be regular, non-deniable charges. However, the alternately billed voice mail and conference call would have a description of the service provided.

BellSouth is only able to address those calls that it records and rates. If any of these calls are recorded and/or rated by another LEC, then that LEC would determine the description and record IDs for those messages.

LIST OF ELEMENTS FOR TELEPHONE NUMBERS STORED IN LIDB

1. Telephone Number (i.e. 404-555-9999)
2. Class of Service (Business, Residence, Coin)
3. Billed Number Screening attributes
 - Collect
 - *Verify* – allow collect calls to be billed to this number
 - *Deny* – Do not allow collect calls to be billed to this number
 - Billed to Third
 - *Verify* – allow Billed to Third calls to be billed to this number
 - *Deny* – Do not allow Billed to Third calls to be billed to this number
4. Toll Billed Exceptions – Using combinations of the attributes listed in #3 above, the following billing options can be derived.
 - *TBE-A (Collect = (D)eny, Billed to Third = (D)eny)*
 - *TBE-B (Collect = (V)erify, Billed to Third = (D)eny)*
 - *TBE-C (Collect = Deny, Billed to Third = (V)erify)*
 - *No TBE (Collect = (V)erify, Billed to Third = (V)erify)*
5. Calling Card
 - *Restricted Pin (Restricted to bill calls only to the associated telephone number, synonymous to a collect call)*
 - *Unrestricted Pin (No restrictions applied, can call any number and bill to the calling card)*

Note: Calling Cards are not allowed on coin telephone numbers. Pins can not begin with a zero (0) or one (1). A customer can have both restricted and unrestricted pins on the same telephone number, but the Pins must be different.

Example of Residence number with no billing restrictions

Telephone Number	Class of Service	Toll Bill Exception	Calling Card
404 – 555 – 2222	Res	No TBE	

Example of Residence number with billing restrictions for Collect and Billed to Third

Telephone Number	Class of Service	Toll Bill Exception	Calling Card
404 – 555 – 4545	Res	TBE A	

Example of Residence number with Collect billing restrictions

Telephone Number	Class of Service	Toll Bill Exception	Calling Card
404 – 555 – 7777	Res	TBE - C	

Example of Residence number with Bill to Third billing restrictions

Telephone Number	Class of Service	Toll Bill Exception	Calling Card
404 – 555 – 0011	Res	TBE - B	