BELLSOUTH TELECOMMUNICATIONS, INC.

REBUTTAL TESTIMONY OF W. KEITH MILNER

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

CASE NO. 2000-465

FEBRUARY 20, 2001

Q. PLEASE STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. ARE YOU THE SAME W. KEITH MILNER WHO EARLIER FILED DIRECT TESTIMONY IN THIS DOCKET?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY BEING FILED TODAY?

A. I will respond to portions of the testimony of AT&T Communications of the South Central States, Inc. and TCG - Ohio (collectively "AT&T")

witnesses Mills and Bradbury with respect to Issues 16, 18, and 19 in whole or in part.

Issue 16: Is conducting a statewide investigation of criminal history records for each AT&T employee or agent being considered to work on a BellSouth premises a security measure that BellSouth may impose on AT&T?

Q. ON PAGES 3-4 OF HIS TESTIMONY, MR. MILLS DISCUSSES CRIMINAL BACKGROUND CHECKS AND ASSERTS THAT BELLSOUTH'S REQUIREMENT IS EXCESSIVE. DOES BELLSOUTH INSIST THAT AT&T PERFORM SECURITY CHECKS OF ALL ITS EMPLOYEES?

A. No. BellSouth is indifferent to the security measures and background checks AT&T makes for its employees to access its own buildings. However, BellSouth is rightly concerned that proper security measures and background criminal checks be performed on AT&T's employees for which AT&T wants unescorted access to BellSouth's premises. If AT&T doesn't want to perform background criminal checks of all of its employees, it need only check those of its employees it wants admitted to BellSouth's premises.

Q. MR. MILLS STATES THAT AT&T WILL INDEMNIFY BELLSOUTH FOR ANY DAMAGE THAT OCCURS TO BELLSOUTH’S PROPERTY

AT BELLSOUTH'S PREMISES AS A RESULT OF THE ACTIVITIES OF AN AT&T EMPLOYEE OR AGENT. PLEASE COMMENT.

A. AT&T's offer to indemnify BellSouth for bodily injury or property damage is not sufficient in light of the assets at risk. Indemnification is an after the fact solution. By requiring criminal background investigations, BellSouth is seeking to protect the consumer and other CLECs up front from the inherent risks.

Q. ON PAGE 4 OF HIS TESTIMONY, MR. MILLS STATES "THERE IS NO INDICATION THAT REQUIRING CRIMINAL BACKGROUND CHECKS WILL IMPROVE SECURITY." DO YOU AGREE?

A. No. Criminal background checks are a reasonable way to prevent known criminals from even being in a place where they could cause harm or damage to BellSouth's or a CLEC's network. Mr. Mills' suggestion is sort of like saying that preventing known bank robbers from working at banks does not lessen the risk that a bank will be robbed.

Issue 18: Has BellSouth provided sufficient customized routing in accordance with State and Federal law to allow it to avoid providing Operator Services/Directory Assistance ("OS/DA") as a UNE?

Q. ON PAGE 39 OF HIS TESTIMONY, MR. BRADBURY ASSERTS

"FROM A PRACTICAL STANDPOINT, THE CUSTOMIZED ROUTING ARCHITECTURE PROPOSED BY BELLSOUTH MUST BE FULLY IMPLEMENTABLE AND AVAILABLE IN EVERY END OFFICE WHERE TECHNICALLY FEASIBLE." DO YOU AGREE?

A. No. Mr. Bradbury would blithely demand that BellSouth spend money to equip each and every one of its end office switches for customized routing on the chance that AT&T or some other CLEC might someday order customized routing in each end office. BellSouth has no obligation to spend its money in such a way. If, on the other hand, AT&T requests customized routing in each and every end office switch, BellSouth will gladly fulfill AT&T's request.

Q. MR. BRADBURY FURTHER ASSERTS THAT THE CUSTOMIZED ROUTING ARCHITECTURE PROPOSED BY BELLSOUTH MUST BE CAPABLE OF SUPPORTING BOTH BRANDED AND UNBRANDED MESSAGING AND ROUTING TO NON-BELLSOUTH PLATFORMS. PLEASE RESPOND.

A. BellSouth's customized routing solutions can be provisioned promptly and can handle both branded and unbranded responses to end users' calls. AT&T need only place an order with BellSouth for customized routing and BellSouth will provide it.

Q. ON PAGE 40 OF HIS TESTIMONY, MR. BRADBURY STATES

"BELLSOUTH HAS PROPOSED LINE CLASS CODE SOLUTION AND AN INTELLIGENT NETWORK ("AIN") SOLUTION FOR CUSTOMIZED ROUTING. THE PROPOSED AIN SOLUTION HAS BEEN PROMISED BY BELLSOUTH FOR SEVERAL YEARS. TO DATE, BELLSOUTH HAS NOT DELIVERED ON ITS PROMISE." DO YOU AGREE?

A. Absolutely not. Both the LCC method and the AIN method are available today. The LCC method is available to CLECs in addition to BellSouth's AIN method and both have been tested and proved workable. If AT&T wants to use the LCC method, it merely needs to order it. Insofar as tests are concerned, AT&T itself participated in cooperative testing of BellSouth's AIN method for customized routing in 1997. Later, BellSouth offered to do a trial of the AIN method in Louisiana yet not one CLEC, not even AT&T, showed the slightest interest in being part of that trial. It is thus surprising to me that Mr. Bradbury faults BellSouth for AT&T's unwillingness to use BellSouth's AIN solution which AT&T itself, in the first round of arbitrations, said it wanted. As with the LCC method, if AT&T wants to use the AIN method, it merely needs to order it.

Q. MR. BRADBURY FURTHER STATES "THAT TRIAL [THAT IS, THE JOINT BELLSOUTH/AT&T TESTING OF THE AIN SOLUTION IN JANUARY 1998] IDENTIFIED CALL SETUP PROBLEMS THAT INCREASED POST-DIALING DELAY TO APPROXIMATELY ONE

SECOND FOR OPERATOR SERVICE CALLS AND TWO SECONDS FOR DIRECTORY ASSISTANCE CALLS." DO YOU AGREE?

A. No. Post dialing delay is the time between when the end user finishes dialing and when the customer is informed (via ringing signal, busy tone, etc.) of the call's progress. All switching systems take some time to translate the dialed digits, select an appropriate trunk group, etc., and all these functions contribute to post dialing delay. So, post dialing delay is not solely a consequence of BellSouth's AIN customized routing solution. With the AIN solution, a computer database is queried during call processing to determine the CLEC's preferred routing for a particular end user. This database query takes time and thus adds a small increment of post dialing delay to the overall processing of the call. BellSouth believes the post dialing delay will be approximately one second. If AT&T is concerned with that small an amount of post dialing delay, AT&T can simply request the Line Class Code method and thereby eliminate its concerns about post dialing delay.

Q. ON PAGE 41 OF HIS TESTIMONY, MR. BRADBURY CLAIMS THAT THE AIN SELECTIVE ROUTING CAPABILITY COULD BE PERFORMED BY THE END OFFICE, ELIMINATING THE POST DIAL DELAY ASSOCIATED WITH THE TANDEM/HUB ARRANGEMENT. WHY DID BELLSOUTH CHOOSE TO PERFORM THE DATABASE QUERY FROM THE AIN HUB RATHER THAN FROM EACH AND

EVERY END OFFICE SWITCH?

A. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages as follows:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN capable to use the AIN customized routing solution.
- Optimizes the use of trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN capable. Also, the AIN hubbing arrangement allows some sharing of common trunk groups, an arrangement that other CLECs have stated they prefer.

Q, ON PAGES 41-42 OF HIS TESTIMONY, MR. BRADBURY ALLEGES THAT THE AIN SOLUTION IS INEFFICIENT BECAUSE IT BYPASSES THE INTELLIGENCE OF THE SWITCH AND REQUIRES EVERY SINGLE CALL TO QUERY THE DATABASE FOR ROUTING INSTRUCTIONS. IS HE CORRECT?

A. No. Mr. Bradbury appears to be generally attacking the use of AIN. He asserts that AIN was not intended to support normal call routing

and does not work well for high-volume based calling. He is wrong. I would note that on-line databases are used millions of times a day for determining whether or not to honor long distance calling cards and for determining the calling name to be displayed on an end user's telephone, just to name a couple of applications. These are certainly high volume calling applications and they are accomplished via AIN solutions. No one seriously claims that these functions should be (or even could be) accomplished by putting that intelligence into each and every single switch in the network. Indeed, flexibility of call routing was a driving motivation for AIN in the first place. Similarly, BellSouth's AIN method for customized routing puts relevant information into an on-line database for use during call processing. This allows CLECs, including AT&T, greater flexibility in determining how to handle the calls from specific end users.

Q. ON PAGE 42 OF HIS TESTIMONY, MR. BRADBURY TURNS HIS ATTENTION TO THE LINE CLASS CODE METHOD FOR CUSTOMIZED ROUTING AND STATES "WHILE LINE CLASS CODES HAVE BEEN USED TO PERFORM CUSTOMIZED ROUTING IN A TEST ENVIRONMENT, BELLSOUTH HAS NOT YET PROVIDED SUFFICIENT INFORMATION SUCH AS ORDERING INSTRUCTIONS AND SUPPORTING DOCUMENTATION TO AT&T FOR EACH OF THE CUSTOMIZED ROUTING OPTIONS THAT BELLSOUTH MUST PROVIDE." PLEASE COMMENT.

A. I am perplexed by his statement. First Mr. Bradbury admits, "...line class codes have been used to perform customized routing in a test environment...." This suggests to me that he agrees that the Line Class Code method works for customized routing. But the second part of his statement is that "...BellSouth has not yet provided sufficient information such as ordering instructions and supporting documentation to AT&T for each of the customized routing options that BellSouth must provide." BellSouth has provided AT&T with a proposed contract language addition for procedures for selective routing. (Attachment 7, Section 3.20 et seq.) This proposed language will provide specific ordering procedures and documentation as requested by AT&T. However, as even Mr. Bradbury admits, AT&T and BellSouth tested the Line Class Code method back in 1997. Despite that testing, he claims there remain certain outstanding issues. I disagree. Whether or not there are any outstanding issues, if AT&T wants the Line Class Code method of customized routing because AT&T prefers it over the AIN method, AT&T should simply order the Line Class Code method which is and has long been available to it.

Q. ON PAGE 44 OF HIS TESTIMONY, MR. BRADBURY STATES "BELLSOUTH MUST BE ABLE TO ROUTE OS/DA CALLS USING EXISTING TANDEM ARCHITECTURE." IS HE CORRECT?

A. No. BellSouth has no obligation to route AT&T's operator services and directory assistance traffic differently than BellSouth routes its own

operator services and directory assistance traffic. I am unaware of any requirement that BellSouth route a CLEC's operator services and directory assistance traffic via a tandem. Further, that is not how BellSouth routes its own operator services and directory assistance traffic. Instead, BellSouth uses direct trunk groups between BellSouth's end office switches and BellSouth's operator services and directory assistance platforms. However, BellSouth will provide unbundled tandem switching to AT&T and AT&T can use that capability as it chooses, subject only to the technical capabilities of the tandem switch.

Q. ON PAGE 45 OF HIS TESTIMONY, MR. BRADBURY SUGGESTS THAT BECAUSE BELLSOUTH HAS NOT YET DEMONSTRATED THAT IT HAS IN PLACE A CUSTOMIZED ROUTING SOLUTION THAT COMPLIES WITH ALL REQUIREMENTS OF THE FCC, THE KENTUCKY PSC SHOULD REQUIRE BELLSOUTH TO CONTINUE TO PROVIDE OS/DA AS UNBUNDLED NETWORK ELEMENTS AT UNBUNDLED NETWORK ELEMENT PRICES. DO YOU AGREE?

A. No. As I discussed previously, BellSouth has available both an AIN solution for customized routing as well as the LCC solution that was advocated by AT&T during the first round of arbitrations. The FCC's Rule 319(f) makes clear that BellSouth is not required to provide access to operator services and directory assistance where it provides CLECs "with customized routing or a compatible signaling protocol."

Thus, BellSouth has met its requirement to provide customized routing and as a result is not obligated to provide access to operator services and directory assistance at cost-based rates.

Issue 19: What procedure should be established for AT&T to obtain loop-port combinations (UNE-P) using both Infrastructure and Customer Specific Provisioning?

Q. ON PAGE 5 OF HIS TESTIMONY, MR. BRADBURY SUGGESTS THAT THERE BE A TWO-PART PROCESS FOR THE PROVISIONING OF CUSTOMIZED ROUTING. DO YOU AGREE?

A. Yes. The first part entails the establishment of required switch translations and trunk groups for the end offices in which the CLEC requests customized routing. This is the "infrastructure provisioning" for customized routing. During this part, BellSouth would establish the Line Class Codes (LCCs) that control the routing as requested by the CLEC as well as any associated trunk groups. Mr. Bradbury refers to this as establishing the "footprint". This part would be required whether AT&T served one or any quantity of end users in a given BellSouth end office switch. Once this part is completed, the second part of the provisioning process is possible. This part is the "customer specific provisioning" for customized routing. During this second part, the CLEC would send its individual Local Service Requests (“LSRs”) for the particular end users that it will serve in a given BellSouth end

office switch within the pre-established footprint.

Q. WHAT IS YOUR UNDERSTANDING OF THE DISAGREEMENT BETWEEN BELLSOUTH AND AT&T REGARDING ISSUE 19?

A. There are two parts to the dispute. The first part concerns whether BellSouth has provided to AT&T sufficient information such that AT&T will know how to prepare its orders for customized routing. BellSouth's witness Pate will address this part of the dispute. The second part of the dispute concerns the meaning of what the FCC meant by "'one set of routing instructions" as it used that phrase in paragraph 224 of its Second Louisiana Order (issued in response to BellSouth's second application for in-region interLATA authority). BellSouth's understanding is that the FCC's Order requires BellSouth to determine the correct Line Class Codes to use in response to an LSR for a given end user only if the CLEC has a single routing plan for all of its customers. While BellSouth reads the FCC's Order to mean that, for BellSouth to be responsible for determining the proper LCC to use on a given LSR, AT&T must have a single routing plan for all its customers in BellSouth's nine-state region, BellSouth is willing to consider a given state, such as Kentucky, as the boundary for satisfying the "single routing plan" situation. AT&T apparently believes the footprint may be as small as a metropolitan area. See Mr. Bradbury's testimony beginning on page 20 at line 22.

Q. WHAT IS YOUR UNDERSTANDING OF THE FCC'S SECOND LOUISIANA ORDER AS IT RELATES TO ISSUE 19?

A. I believe the FCC was trying to establish a requirement that BellSouth's competitors (such as AT&T) have the ability to create a default assignment of routing plans for their end users as does BellSouth. When a BellSouth retail customer orders service, BellSouth defaults the customer to BellSouth's own branded operator services and directory assistance. BellSouth believes that AT&T is asking BellSouth to create a situation where AT&T too can have a default for its customers. That is what the footprint does. The footprint informs BellSouth of how calls from AT&T's end users served by a BellSouth switch are to be routed unless AT&T informs BellSouth otherwise.

If this is what AT&T really wants, then BellSouth only has two issues. The first is to set the level at which such instructions have to be given. That is, will this default plan apply to the region as a whole, or on a state-by-state basis, or perhaps on a different level? I will speak to this more in a moment. Second, once the appropriate level for applying the default is determined, AT&T has to tell BellSouth what the default will be.

Q. ON PAGE 23 OF HIS TESTIMONY, MR. BRADBURY ASSERTS THAT "BELLSOUTH WISHES TO LIMIT AT&T TO ONLY ONE CUSTOMIZED OS/DA ROUTE, APPARENTLY FOR AN ENTIRE

STATE". PLEASE COMMENT.

A. AT&T is free to have as many different routing plans as it wants within the technical limitations of the switches themselves. The dispute regards which party (that is, BellSouth or AT&T) is responsible for determining which LCCs are to be used for a given LSR in cases where the CLEC has more than one routing plan for its end users. In its Second Louisiana Order, the FCC stated that if a CLEC informed an ILEC of its single set of routing instructions, that the ILEC rather than the CLEC could determine the appropriate LCC to use in for a given LSR. Following is the FCC's statement in paragraph 224 of its Second Louisiana Order:

> "We agree with BellSouth, that a competitive LEC must tell BellSouth how to route its customers' calls. If a competitive LEC wants all of its customer calls routed in the same way, it should be able to inform BellSouth, and BellSouth should be able to build the corresponding routing instructions into its systems just as BellSouth has done for itself. If, however, a competitive LEC has more that one set of routing instructions for its customers, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use." [Emphasis added]

BellSouth has no problem with the FCC's position. AT&T must, however, provide a single routing instruction to be used as the default. In cases where the default routing plan is not to be used for a particular end user, AT&T must inform BellSouth (via the LSR) which other routing pattern is to be used.

Q. WHAT SPECIFIC INPUT DOES AT&T NEED TO PROVIDE TO BELLSOUTH?

A. First, AT&T needs to inform BellSouth of how BellSouth is to “map” or route AT&T’s customers to AT&T’s choice of handling (branded, unbranded, etc.). Second, AT&T needs to inform BellSouth of the geographic scope of AT&T’s default routing plan (region, state, LATA, etc.) so BellSouth can construct the required translations tables. In Mr. Bradbury’s testimony, he indicates that the geographic scope of the default routing plan should be at AT&T’s option such as, by metropolitan area, or by state. Again, paragraph 224 of the FCC’s Second Louisiana Order states that if a CLEC has more that one set of routing instructions for all its customers, it would be appropriate for BellSouth to require the CLEC to include in the CLEC’s order an indicator that would inform BellSouth which customized routing pattern to use. This would imply application on a region-wide basis. Thus, BellSouth believes the FCC intended for a CLEC to have a default routing plan for the entire region. As I stated earlier, BellSouth is willing to allow a given state to serve as the default routing plan

footprint. That is, AT&T could elect a given default routing plan for Kentucky and a different default routing plan for Alabama.

Q. HAS AT&T GIVEN BELLSOUTH A DEFAULT ROUTING PLAN FOR AT&T's CUSTOMERS?

A. No. The testimony of Mr. Bradbury is ample proof that AT&T has still not done so. Instead of committing to a single routing plan as contemplated by the FCC's Order, AT&T still insists that routing decisions (and thus assignment of Line Class Codes) is situational. Mr. Bradbury suggests that AT&T will decide on a routing pattern by metropolitan area, or by state, at AT&T's option. Thus, it is clear that even now AT&T has no single default routing plan that it can or will convey to BellSouth that is instructive of how certain customers are to be handled. So AT&T wants BellSouth to read AT&T's mind and assign Line Class Codes correctly. This is simply not possible. If AT&T will commit to the single default routing plan contemplated by the FCC in its Second Louisiana Order and inform BellSouth of its routing plan, then and only then can BellSouth correctly assign Line Class Codes on AT&T's orders.

Q. SUPPOSE AT&T DECIDES THAT THE ENTIRE STATE OF KENTUCKY IS ITS "FOOTPRINT" AND INFORMS BELLSOUTH THAT AS BELLSOUTH RECEIVES LSRs FOR AT&T's CUSTOMERS IN KENTUCKY, AT&T's CUSTOMERS' OS/DA CALLS SHOULD BE

ROUTED TO AT&T's PLATFORM. WILL BELLSOUTH KNOW HOW TO PROCESS AT&T's LSRs WITHOUT AT&T INDICATING THE CORRECT LINE CLASS CODE TO USE?

A. Yes. BellSouth will have built the proper switch translations (including LCCs) in its switches along with any required trunk groups. At the time the LSR is sent to BellSouth for a particular AT&T end user, BellSouth will know the correct LCC to use.

Q. IN THAT SAME SITUATION, SUPPOSE AT&T DECIDES THAT FOR A PARTICULAR END USER WITHIN ITS FOOTPRINT, THE CUSTOMER'S OS/DA CALLS SHOULD BE SENT TO BELLSOUTH'S PLATFORM INSTEAD OF TO AT&T's PLATFORM. WILL BELLSOUTH KNOW HOW TO PROCESS AT&T's LSR WITHOUT AT&T INDICATING THE CORRECT LINE CLASS CODE TO USE?

A. No. While the routing that AT&T desires for a particular end user in this case is possible (assuming that AT&T had previously requested and BellSouth had built LCCs and associated trunk groups for these "exception" orders), only AT&T knows when it wants the default to apply (that is, the footprint is used) versus when it wants the exception to apply (that is, the exception routing plan). AT&T is free to have a default routing plan and as many different exception routing plans as it wants (within the technical limits of the switches). For the default routing plan, AT&T need not instruct BellSouth of which set of LCCs to

use. However, for end users for which AT&T desires that exception routing plans be used, AT&T must inform BellSouth of which set of LCCs to use.

Q. ON PAGE 32 OF HIS TESTIMONY, MR. BRADBURY STATES THAT BELLSOUTH PROVIDES NO PROCESSES FOR ELECTRONIC ORDERING OF CUSTOMIZED ROUTING FOR SPECIFIC END USERS. IS HE CORRECT?

A. No. Let me make clear however that here I am not discussing the initial establishment of the default footprint (the so-called infrastructure provisioning step). Instead, I am discussing the situation where AT&T has previously requested and BellSouth has provided required LCCs and associated trunk groups. Then, AT&T sends its LSR for a given end user and does not denote on its LSR that any exception routing is to be used (that is, the default routing plan is to be used). BellSouth's electronic ordering processing for CLECs' orders can handle this situation. BellSouth completed work and installed changes in its electronic gateway on November 18, 2000. This is referred to as Change Request EDI 020900 that was incorporated into Release 8.0. Despite an admittedly confusing memorandum sent to CLECs on October 11, 2000, the change was made on November 18, 2000, as had been previously scheduled.

Q. ON PAGE 34 OF HIS TESTIMONY, MR. BRADBURY STATES THAT

YOU HAD PERSONALLY ISSUED A MEMORANDUM DIRECTING THAT THE DECISION BE REVERSED. HE ATTACHES A PORTION OF THE TRANSCRIPT FROM THE ARBITRATION HEARING IN GEORGIA. PLEASE COMMENT.

A. Mr. Bradbury mischaracterizes what I said. In his testimony he says that I had personally issued a memo directing that the decision (that is, the decision to drop Change Request EDI 020900 from Release 8.0) be reversed and that CLECs be so informed immediately. That is not correct. What I said during the Georgia hearing was "The first thing I did when I came in to work that morning and found that memo [that is, the memorandum attached to Mr. Bradbury's testimony as Page 3 of Exhibit JMB-8] was to find the people that had written that memo and had them in my office and had them retract that to show that the line class code method would be available." See page 6 of Exhibit JMB-7 attached to Mr. Bradbury's testimony. That was and is a true statement. The point of the clarification I sought via the second memorandum was to ensure CLECs that the LCC method of customized routing would be available even once BellSouth introduced the so-called Originating Line Number Screening (OLNS) branding method. The next statement I made during the Georgia hearing was "And I immediately set about making sure that the people doing the software upgrades [that is, Change Request EDI 020900 in Release 8.0] did not divert their attention and move that out of release 8.0." BellSouth and I were in fact successful in keeping EDI 020900 as part

of Release 8.0 and that software was successfully loaded and made available to CLECs on November 18, 2000.

Q. REGARDING THE ELECTRONIC ORDERING CAPABILITY PROVIDED WITH CHANGE REQUEST EDI 020900, ON PAGE 36 OF HIS TESTIMONY, MR. BRADBURY STATES "THUS, BELLSOUTH PLANS TO PROVIDE ONLY A VERY LIMITED TRIAL VERSION OF THE PRODUCTION FUNCTIONALITY THAT WAS CANCELLED." IS HE CORRECT?

A. No. BellSouth stands ready to implement as large a customized routing footprint as AT&T desires and the software upgrades included in Change Request EDI 020900 can accommodate such. To date, however, AT&T's self-imposed footprint is very small. Mr. Bradbury's statement on page 35 of his testimony that no CLEC other than AT&T can use the electronic ordering capability provided is misleading. No other CLEC has requested that BellSouth provide it the LCC method for customized routing, thus no customized routing footprint exists for any CLEC other than AT&T. The same capability that is available to AT&T for the electronic processing of its LSRs is available to every other CLEC. Upon request, BellSouth will establish any CLEC's customized routing default footprint reflecting that CLEC's choices for treatment of its end users' OD/DA calls. Then BellSouth can handle that CLEC's LSRs for its end users on an electronic basis just as BellSouth can do for AT&T.

On page 37 of his testimony, Mr. Bradbury suggests that the Kentucky PSC order BellSouth to provide AT&T with an ordering capability that will allow AT&T to place individual customer orders electronically, utilizing a single region-wide indicator for each routing option, whereby the orders should flow through without the need to place additional indicators on its LSRs. In fact, BellSouth is already providing such functionality with the software upgrades put in place on November 18, 2000.

Q. WHAT DOES BELLSOUTH PROPOSE TO RESOLVE THIS ISSUE?

A. BellSouth asks this Commission to affirm that it has met its requirements for providing customized routing and that BellSouth is not required to provide operator services and directory assistance as unbundled network elements at cost-based rates.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.